

Matthew A. Clemente (admitted *pro hac vice*)
Dennis M. Twomey (admitted *pro hac vice*)
Alyssa Russell (admitted *pro hac vice*)
Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036

Penny P. Reid
Paige Holden Montgomery
Juliana L. Hoffman
Sidley Austin LLP
2021 McKinney Avenue
Suite 2000
Dallas, Texas 74201
Telephone: (214) 981-3300
Facsimile: (214) 981-3400

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

Objection deadline: May 12, 2021 @ 5:00 p.m. (CT)
Hearing Date: TBD

**SUMMARY COVER SHEET FOR THE FIFTH INTERIM FEE APPLICATION
OF SIDLEY AUSTIN LLP, ATTORNEYS FOR THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, FOR COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM DECEMBER 1, 2020
THROUGH AND INCLUDING FEBRUARY 28, 2021**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Name of Applicant:	Sidley Austin LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors of Highland Capital Management, LP
Date of Retention:	October 29, 2019 by Order entered January 9, 2019
Time period covered by this Application:	December 1, 2020 – February 28, 2021
Total amounts awarded in prior Applications:	NA
Total amount of fees requested in this Application:	\$1,957,009.95
Total amount of reimbursable expenses sought in this Application:	\$23,156.48

This is a: ☐ monthly ☒ interim ☐ final application.

This is Sidley’s fifth interim fee application.

PRIOR MONTHLY APPLICATIONS FILED

		Requested		Approved		Outstanding	
Date Filed; Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1/10/20; #343	10/29/19- 11/30/19	\$993,818.70	\$10,247.88	\$993,818.70	\$10,247.88	\$0.00	\$0.00
1/31/20; #420	12/1/19- 12/31/19	\$878,331.60	\$30,406.08	\$878,331.60	\$30,406.08	\$0.00	\$0.00
3/4/20; #501	1/1/20- 1/31/20	\$711,364.50	\$12,673.30	\$711,364.50	\$12,673.30	\$0.00	\$0.00
3/20/20; #542	2/1/20- 2/29/20	\$571,444.65	\$2,927.21	\$571,444.65	\$2,927.21	\$0.00	\$0.00
4/20/20; #594	3/1/20- 3/31/20	\$596,045.25	\$14,406.39	\$596,045.25	\$14,406.39	\$0.00	\$0.00
5/20/20; #639	4/1/20- 4/30/20	\$548,274.15	\$5,765.07	\$548,274.15	\$5,765.07	\$0.00	\$0.00
6/22/20; #767	5/1/20- 5/31/20	\$429,530.85	\$2,758.75	\$429,530.85	\$2,758.75	\$0.00	\$0.00

7/20/20; #877	6/1/20- 6/30/20	\$617,236.20	\$5,759.29	\$493,788.96	\$5,759.29	\$0.00	\$0.00
8/19/20; #969	7/1/20- 7/31/20	\$663,867.90	\$10,470.96	\$531,094.32	\$10,470.96	\$0.00	\$0.00
9/19/20; #1074	8/1/20- 8/31/20	\$584,416.35	\$2,448.22	\$467,533.08	\$2,448.22	\$0.00	\$0.00
10/23/20; #1283	9/1/20- 9/30/20	\$446,112.45	\$2,204.73	\$356,889.96	\$2,204.73	\$89,222.49	\$0.00
11/30/20; #1490	10/1/20- 10/31/20	\$672,302.25	\$3,125.47	\$537,841.80	\$3,125.47	\$134,460.45	\$0.00
12/24/20; #1632	11/1/20- 11/30/20	\$502,074.90	\$3,643.80	\$401,659.92	\$3,643.80	\$502,074.90	\$3,643.80
1/26/21; #1842	12/1/20- 12/31/20	\$520,448.85	\$5,403.36	\$416,359.08	\$5,403.36	\$520,448.85	\$5,403.36
3/2/21; #1963	1/1/21- 1/31/21	\$819,656.10	\$6,612.00	\$655,724.88	\$6,612.00	\$819,656.10	\$6,612.00
4/5/21; #2160	2/1/21- 2/28/21	\$616,905.00	\$11,141.12	<i>Pending</i>	<i>Pending</i>	\$616,905.00	\$11,141.12

**SUMMARY OF TOTAL FEES AND HOURS
BY ATTORNEYS AND PARAPROFESSIONALS**

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed²	Total Compensation
Suresh T. Advani	Partner Restructuring	1992	\$1,625	1.70	\$2,762.50
Matthew A. Clemente	Partner Restructuring	1998	\$1,350	372.30	\$495,382.50
Thomas D. Cunningham	Partner Litigation	1995	\$1,200	4.80	\$5,760.00
Thomas A. Labuda	Partner Restructuring	1994	\$1,350	.20	\$270.00
Paige H. Montgomery	Partner Litigation	2002	\$1,125	304.50	\$333,607.50
Kevin R. Pryor	Partner Tax	1997	\$1,250	.30	\$375.00
Penny R. Reid	Partner Litigation	1989	\$1,400	132.80	\$184,157.50

² Sidley charged for only 50% of non-working travel time. Such reductions are reflected in the figures in this column.

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed ²	Total Compensation
Dennis M. Twomey	Partner Restructuring	2000	\$1,350	137.50	\$184,807.50
Patrick S. Casey	Senior Counsel Litigation	1984	\$1,100	2.10	\$2,310.00
William A. Evanoff	Counsel Restructuring	2000	\$1,050	1.30	\$1,365.00
Mustafa Abdul-Jabbar	Associate Litigation	2016	\$930	105.50	\$90,645.00
Elliot A. Bromagen	Associate Restructuring	2017	\$885	231.00	\$198,924.00
Ian C. Ferrell	Associate Restructuring	2021	\$590	14.30	\$8,613.00
Ryan Fink	Associate Restructuring	2021	\$590	28.30	\$16,915.00
Patrick G. Foley	Associate Litigation	2013	\$1,025	62.10	\$60,894.50
Juliana Hoffman	Associate Restructuring	2017	\$815	96.30	\$74,872.50
Taylor Nifong	Associate Restructuring	2020	\$610	102.40	\$62,254.00
Chandler M. Rognes	Associate Litigation	2019	\$715	185.70	\$120,639.00
Alyssa Russell	Associate Restructuring	2015	\$970	264.90	\$251,878.50
Nancy P. Cade	Paralegal Litigation	30 years	\$450	19.60	\$8,244.00
Crystal Clark	Paralegal Litigation	10 years	\$415	22.30	\$8,784.50
David J. Lutes	Paralegal Restructuring	34 years	\$490	123.40	\$59,851.00
Bill Kirchoff	Research Analyst Library	20 years	\$270	1.50	\$405.00
Elisabeth Nosarios	Research Analyst Library	10 years	\$225	1.00	\$225.00
Marco Ruiz	Research Analyst Library	2 years	\$225	1.00	\$225.00
Ronnie Schulman	Research Analyst Library	16 years	\$240	1.20	\$288.00
Total				2,218.00	\$2,174,455.50
10% Discount					\$217,445.55
Grand Total					\$1,957,009.95
Blended Rate					\$882.33

STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY

Task Description	Total Hours	Total Fees
005 – Committee Meetings	98.40	\$99,778.50
006 – Business Operations	36.50	\$36,245.00
007 – Case Administration	141.50	\$150,192.50
008 – Claims Administration and Objections	28.70	\$29,915.00
009 – Corporate Governance	53.80	\$58,785.50
010 – Employee Benefits and Pensions	2.80	\$2,989.00
011 – Retention	10.50	\$9,895.00
012 – Fee Applications	128.00	\$67,153.50
014 – Litigation	1,187.60	\$1,142,451.50
015 – Plan and Disclosure Statement	501.20	\$538,988.00
016 – Non-Working Travel ³	0.00	\$0.00
019 – Relief from Stay and Adequate Protection	1.90	\$1,681.50
021 – Tax	2.00	\$3,137.50
024 – Creditor Communications	25.10	\$33,243.00
TOTAL	2,218.00	\$2,174,455.50
TOTAL WITH 10% DISCOUNT		\$1,957,009.95

EXPENSE SUMMARY

Category	Amount
Copying	\$95.99
Delivery Services/Messenger	\$501.94
Litigation Support Vendors	\$7,743.50
On-line Research Services (Westlaw, Lexis, Pacer and related services)	\$8,771.26
Professional Services/Specialists (includes Transunion Risk and Data Solutions)	\$65.00
Telephone (includes non-local calls)	\$8.99
Transcripts (includes trial and deposition transcripts)	\$5,969.80
TOTAL:	\$23,156.48

³ As noted above, Sidley charged the Debtor for only 50% of non-working travel time.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

**Objection deadline: May 12, 2021 @ 5:00 p.m. (CT)
Hearing: TBD**

**FIFTH INTERIM FEE APPLICATION OF SIDLEY AUSTIN LLP, ATTORNEYS FOR
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM DECEMBER 1, 2020 THROUGH AND INCLUDING FEBRUARY 28, 2021**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), and the Delaware Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, entered on November 14, 2019 [Docket No. 136] (the “Interim Compensation Procedures Order”), Sidley Austin LLP (“Sidley”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby files this fifth interim fee application (this “Application”) for entry of an order (the “Order”), substantially in the form attached to this Application as **Exhibit A** granting interim allowance of (a) compensation for professional services to the Committee during the period from December 1, 2020 to and including February 28, 2021 (the “Interim Fee Period”) in the amount of \$1,957,009.95, and

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

(b) reimbursement of the actual and necessary expenses incurred by Sidley during the Interim Fee Period, in the amount of \$23,156.48. In support of this Application, Sidley submits the declaration of Matthew A. Clemente, a partner of Sidley (the “Clemente Declaration”), which is attached hereto as **Exhibit B**. In further support of the Application, Sidley respectfully represents as follows:

STATUS OF CASE AND JURISDICTION

1. On October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”). The Debtor has continued in possession of its properties and has continued to operate and manage its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On October 29, 2019, the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed its Notice of Appointment of Committee of Unsecured Creditors [Docket No. 65].

3. On November 14, 2019, the Delaware Court signed the Interim Compensation Procedures Order, authorizing certain professionals and members of any official committee (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to procedures specified therein. The Interim Compensation Procedures Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within twenty-one (21) days after service of the monthly fee application the Debtor is authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending December 31, 2019 and at three-month intervals or such other

intervals convenient to the Court, each Professional shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. On December 4, 2019, the Delaware Court entered an order transferring venue of this case from the District of Delaware to the Northern District of Texas [Docket No. 1084].

5. The United States Bankruptcy Court for the Northern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

6. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The statutory and other bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, Local Rule 2016-1, and the Interim Compensation Order. This Application also substantially complies with the requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. §330 by Attorneys in Larger Chapter 11 Cases, Effective as of November 1, 2013* (the “U.S. Trustee Guidelines”), and the *General Order 2006-02 Regarding Procedures For Complex Chapter 11 Cases* from the United States Bankruptcy Court Northern District of Texas.

8. The Committee retained Sidley as its bankruptcy counsel, *nunc pro tunc*, to October 29, 2019, pursuant to the *Order Authorizing the Retention and Employment of Sidley Austin LLP as Counsel to the Official Committee of Unsecured Creditors, Nunc Pro Tunc to October 29, 2019* [Docket No. 334] (the “Retention Order”). The Retention Order authorizes the Committee to compensate and reimburse Sidley in accordance with the terms and conditions

set forth in the Committee's application to retain Sidley, subject to Sidley's application to the Court.

SIDLEY'S PRIOR FEE APPLICATIONS

9. The Interim Compensation Order provides that, during pendency of this Chapter 11 Case, all retained professionals shall file with the Court monthly applications for interim allowance of compensation of services rendered and reimbursement of expenses incurred in connection with such services, together with copies of the applicable time records and itemized expenses (each a "Monthly Fee Application"). Pursuant to the procedures set forth in the Interim Compensation Order, Sidley has filed with the Court and served upon the appropriate notice parties a Monthly Fee Application for each month from the December 1, 2020 through February 28, 2021. Each of Sidley's Monthly Fee Applications is incorporated herein by reference.² The computerized records of time expended providing professional services to the Committee are attached hereto as Exhibit C.³ A detailed statement of Sidley's out-of-pocket expenses incurred during the Interim Fee Period is attached hereto as Exhibit D.⁴

10. In addition to establishing procedures for the submission of Monthly Fee Applications, the Interim Compensation Order provides that, beginning with the period from the Petition Date to and including February 29, 2020, and continuing at regular intervals thereafter during the pendency of this Chapter 11 Case, each professional may file with the Court an application for interim approval and allowance of any outstanding compensation for

² The docket numbers of Sidley's Monthly Fee Applications are 1842, 1963 and 2160. The docket numbers of the corresponding certificates of no objection for Sidley's three Monthly Fee Applications are 1940, 2116 and TBD.

³ Detailed time records which relate to the periods covered by each Monthly Fee Application were also attached to the Monthly Fee Applications as Exhibit A thereto.

⁴ Detailed expense records which relate to the periods covered by each Monthly Fee Application were also attached to each Monthly Fee Application as Exhibit B thereto.

services rendered and reimbursement of expenses sought in the Monthly Fee Applications filed during such period.

11. A summary of the Monthly and Interim Fee Applications previously filed in this Chapter 11 Case is set forth in the chart below:

		Requested		Approved		Outstanding	
Date Filed; Docket Nos.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1st Interim ⁵ ; 4/7/20; [ECF No. 569]	10/29/19 – 2/29/20	\$3,154,959.45	\$56,254.47	\$3,154,959.45	\$56,254.47	\$0.00	\$0.00
2nd Interim 7/14/20; [ECF No. 831]	3/1/20 – 5/31/20	\$1,573,850.25	\$22,930.21	\$1,573,850.25	\$22,930.21	\$0.00	\$0.00
3rd Interim; 10/27/20; [ECF No. 1296]	6/1/20 – 8/31/20	\$1,865,520.45	\$18,678.47	\$1,865,520.45	\$18,678.47	\$0.00	\$0.00
4th Interim; 1/27/21; [ECF No. 1853]	9/1/20 – 11/30/20	\$1,620,489.60	\$8,974.00	\$1,296,391.68	8,974.00	\$324,097.92	\$0.00
14th Monthly; 1/26/21; [ECF No. 1842]	12/1/20 – 12/31/20	\$520,448.85	\$5,403.36	\$416,359.08	\$5,403.36	\$520,448.85	\$5,403.36
15th Monthly; 3/2/21; [ECF No. 1963]	1/1/21 – 1/31/21	\$819,656.10	\$6,612.00	\$655,724.88	\$6,612.00	\$819,656.10	\$6,612.00
16th Monthly; 4/5/21; [ECF No. 2160]	2/1/21 – 2/28/21	\$616,905.00	\$11,141.12	<i>Pending</i>	<i>Pending</i>	\$616,905.00	\$11,141.12
Total		\$10,171,829.70	\$129,993.63	\$8,962,805.79	\$118,852.51	\$2,281,107.87	\$23,156.48

RELIEF REQUESTED

12. By this Application, Sidley respectfully requests entry of an order (a) granting allowance and approval of compensation for Sidley's services to the Committee for the Interim Fee Period in the amount of \$1,957,009.95, (b) reimbursement of expenses that Sidley incurred during the Interim Fee Period in the amount of \$23,156.48, and (c) authorizing and directing payment of such sums to Sidley pursuant to the Interim Compensation Order.

⁵ Sidley's First Interim Fee Application incorporated Sidley's first, second, third and fourth Monthly Fee Statements.

FEES EARNED DURING THE INTERIM FEE PERIOD

I. Customary Billing Disclosures

13. Sidley's hourly rates are set at a level designed to compensate Sidley fairly for the work of its attorneys and paraprofessionals and to cover fixed and routine expenses. The hourly rates charged by Sidley in this Chapter 11 Case were billed in accordance with Sidley's rates and procedures in effect during the Interim Fee Period and in accordance with the Retention Order. As described in the Retention Application, the rates Sidley charges for the services of its attorneys and paraprofessionals in this Chapter 11 Case are consistent with the rates Sidley charges other comparable chapter 11 clients, regardless of the location of the case. Moreover, Sidley's rate structure is appropriate and not significantly different from the rates that Sidley charges for non-bankruptcy representations or the rates that other comparable counsel would charge to perform substantially similar services.

14. Sidley has received no payment or promises of payment from any source other than the Committee for services rendered in this Chapter 11 Case. There is no agreement or understanding between Sidley and any other entity or person, other than members of the Firm, for the sharing of compensation to be received for services rendered in or in connection with this Chapter 11 Case. All professional and paraprofessional services for which Sidley is requesting compensation were rendered solely on behalf of the Committee.

II. Supporting Documentation

15. For the convenience of the Court and parties in interest and in accordance with paragraph C of the U.S. Trustee Guidelines, the following information is prefixed to this Application:

- (a) a cover sheet summarizing the contents of this Application;

- (b) schedules identifying all Sidley attorneys and paraprofessionals who provided services to the Committee during the Interim Fee Period, including, with respect to each attorney and paraprofessional, as applicable, his or her position and area of expertise, date of admission or years of experience, hourly rate, hours billed and total fees charged;
- (c) a summary of Sidley's compensation by project matter category for services provided to the Committee during the Interim Fee Period; and
- (d) a summary of the actual and necessary expenses that Sidley incurred during the Interim Fee Period in connection with its professional services to the Committee.

16. In addition: (a) the Clemente Declaration, which includes, among other things, a statement under paragraph C.5 of the U.S. Trustee Guidelines, is attached hereto as **Exhibit B**; (b) the budget and staffing plan of Sidley for the Interim Fee Period is attached hereto as **Exhibit E**; and (c) Sidley's disclosures of customary and comparable compensation, including blended hourly rates, for the Interim Fee Period is attached hereto as **Exhibit F**.

SUMMARY OF SERVICES

17. During the Interim Fee Period, Sidley vigorously represented the Committee and enhanced its understanding of many issues critical in this Chapter 11 Case, thereby providing their constituency with the opportunity to obtain a meaningful recovery. During the Interim Fee Period, the Committee: (a) negotiated for a plan of reorganization acceptable to creditors, including designing the structure of the post reorganization debtor and strategizing with the Debtor to maximize value and decrease costs for the benefit of all stakeholders (b) negotiated various stipulations and consensual resolutions to outstanding motions, (c) commenced critical investigations. The advice and assistance of Sidley in connection with these and all other facets of the Committee's oversight of the Debtor's reorganization serves as the basis for the compensation requested in this Application.

18. The services rendered by Sidley during the Interim Fee Period can be grouped into the categories set forth below. Sidley attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category.

(a) Committee Meetings – Category No. 5

Interim Fee Period: 98.40 hours; \$99,778.50

19. This matter category includes time spent by Sidley attorneys and paraprofessionals in connection with regular and special meetings held telephonically with the Committee, the Committee's other professional advisors, and the Committee members' advisors.

(b) Business Operations – Category No. 6

Interim Fee Period: 36.50 hours; \$36,245.00

20. This matter category includes time spent by Sidley attorneys analyzing, performing diligence on, negotiating, and in some instances objecting to various asset sale, distribution, contribution or other transactions proposed by the Debtor in furtherance of the Committee's oversight role under the agreed protocols. Specifically, this includes time spent investigating and analyzing potential ordinary course transactions, including the payment of certain notes and employee compensation packages, as well as strategic discussions with the Committee's financial professionals, the Debtor's professionals, and the Debtor's independent directors.

(c) Case Administration – Category No. 7

Interim Fee Period: 141.50 hours; \$150,192.50

21. This matter category includes time spent on various tasks that were necessary to ensure the efficient administration of legal services related to this Chapter 11 Case. Specifically, Sidley attorneys and paraprofessionals spent time (i) coordinating, managing and administering this Chapter 11 Case, including reviewing filings on the case docket, monitoring critical dates, and maintaining a case calendar, work plan and status reports; (ii) communicating with the Committee, its members, their advisors and the Debtor's counsel to coordinate and manage various work streams throughout the Chapter 11 Case; (iii) reviewing procedures for case administration and docket monitoring; (iv) organizing and maintaining document files for the case; (v) ensuring compliance with service and notice requirements of the Bankruptcy Code, the Bankruptcy Rules, Local Rules, including coordinating service of pleadings and related notices with the Debtor's claims and noticing agent; (vi) ensuring compliance with all other applicable requirements of the Bankruptcy Code, Bankruptcy Rules, Local Rules and orders and procedures issued by the Court; (vii) reviewing monthly operating reports of the Debtor; and (viii) communicating with the Court regarding hearings and various procedural matters. This matter category also includes work and meetings related to multiple matters such that the time cannot be easily allocated to one of the other matter categories.

(d) Claims Administration and Objections – Category No. 8

Interim Fee Period: 28.70 hours; \$29,915.00

22. This matter category includes time spent by Sidley attorneys reviewing and analyzing various proofs of claim filed against the Debtor, as well as the terms of proposed settlement agreements and 9019 motions in connection with claims against the estate. Additionally, Sidley reviewed, assessed and advised the Committee on applications for

administrative expense claims and adversary complaints arising in connection with objections to claims. This matter category also includes strategic discussions and review of the Debtor's claims analysis and proposal for reducing the Debtor's claim pool, as well as the Committee's own analysis of implications for disputing or settling Debtor claims.

(e) Corporate Governance and Board Matters – Category No. 9

Interim Fee Period: 53.80 hours; \$58,785.50

23. This matter category includes time spent by Sidley attorneys in connection with the Debtor's governance structure, including participating and advising the Committee on communications and conferences with the Debtor's independent board of directors. This matter category also includes time spent analyzing and strategizing with other professionals regarding the Debtor's post-effective date governance structure.

(f) Employee Benefits and Pensions – Category No. 10

Interim Fee Period: 2.80 hours; \$2,989.00

24. This matter category includes time spent by Sidley attorneys reviewing various compensation plans and related motions, including the KERP motion, as well as analyses and strategic development in furtherance of employee programs.

(g) Retention – Category No. 11

Interim Fee Period: 10.50 hours; \$9,895.00

25. This matter category includes time spent by Sidley attorneys and paraprofessionals providing services related to the analysis and negotiation of the Liquidating Trustee retention application and candidates for post-effective date roles.

(h) Fee Applications – Category No. 12

Interim Fee Period: 128.00 hours; \$67,153.50

26. This matter category includes time spent by Sidley attorneys and paraprofessionals: (i) preparing monthly fee application materials and exhibits; (ii) ensuring that the time entries and expense entries for which Sidley is requesting compensation and reimbursement pursuant to this Application comply with the applicable provisions of the Bankruptcy Rules, Local Rules and the U.S. Trustee Guidelines; (iii) reviewing the U.S. Trustee Guidelines; (iv) advising the Committee's other professionals on matters related to fee applications and compliance with U.S. Trustee Guidelines and Local Rules; and (v) engaging in correspondence with the Committee and its other professionals regarding the same.

(i) Litigation – Category No. 14

Interim Fee Period: 1,187.60 hours; \$1,142,451.50

27. This matter category includes time spent by Sidley attorneys and paraprofessionals providing services related to matters in an adversarial posture, as well as investigating potential claims and causes of action held by the Debtor's estate. Specifically, Sidley attorneys spent time: (i) assessing potential causes of action to leverage estate value and developing strategy for such potential litigation; (ii) researching, drafting and analyzing various discovery-related issues and pleadings, including the Committee's Preservation Motion, privilege logs and document review; (iii) analyzing and advising the Committee on various pleadings and adversary proceedings, including the Debtor's Contempt Motion and the implications of the TRO violation; (iv) preparing for and participating in depositions and Court hearings, and (v) reviewing and analyzing potential causes of action to pursue on behalf of the estate for the benefit of the creditors and creditor-constituents.

(j) Plan and Disclosure Statement – Category No. 15

Interim Fee Period: 501.20 hours; \$538,988.00

28. This matter category includes time spent by Sidley attorneys related to the review, analysis and negotiation surrounding the terms of the Debtor's Plan, litigation trust agreement and related issues, as well as overall investigation into and strategy regarding the Debtor's emergence. This matter category also includes time spent researching and drafting responses in furtherance of Plan confirmation, as well as advising the Committee of confirmation-related issues, including potential appeals of the confirmation order. Sidley attorneys utilized this matter category for time spent engaging in strategic discussions with the Committee's financial advisors regarding the Plan process and implications, the ongoing assessment of post-confirmation and Plan-related issues, and analyses of competing plan proposals.

(k) Relief from Stay and Adequate Protection – Category No. 19

Interim Period: 1.90 hours; \$1,681.50

29. This matter category includes time spent analyzing motions for relief from the automatic stay, as well as preparing for and attending hearings related to same.

(l) Tax – Category No. 21

Interim Fee Period: 2.00 hours; \$3,137.50

30. This matter category includes Sidley attorneys' review and analysis of the tax implications of certain transactions, as well as time spent conferring with the Committee's financial advisors to assess the Debtor's tax issues. Additionally, this matter category includes time spent by analyzing and revising projections and tax issues in connection with the Debtor's chapter 11 plan, litigation trust and potential tax implications related to the disputed claims reserve.

(m) Creditor Communications – Category No. 24

Interim Fee Period: 25.10 hours; \$33,243.00

31. This matter category includes time spent by Sidley attorneys communicating with individual unsecured creditors and their respective counsel (both members of the Committee and non-members) regarding the status of specific motions, discovery and Plan-related issues, as well as the status of the case generally.

ACTUAL AND NECESSARY EXPENSES

32. Attached hereto as **Exhibit D** is a detailed statement of Sidley’s out-of-pocket expenses incurred during the Interim Fee Period, totaling \$23,156.48. These expenses include, but are not limited to, reprographics services, court fees, out-of-town travel expenses, and litigation support vendors.

**SIDLEY’S REQUESTED COMPENSATION AND
EXPENSE REIMBURSEMENT SHOULD BE ALLOWED**

33. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also establishes the following non-exclusive criteria to determine the amount of reasonable compensation to be awarded:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered towards the completion of, a case under this title;

- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and expertise in the bankruptcy field; and
- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

34. Sidley respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, necessary for and beneficial to the Committee and were rendered to assist the Committee in discharging its statutory duties during the pendency of this Chapter 11 Case. Sidley further believes that its services to the Committee during the Interim Fee Period were performed efficiently and in an expert manner and ultimately benefitted the Committee and the Debtor's unsecured creditors, the Debtor, and its estate. Sidley submits that the compensation requested herein is reasonable in light of the nature, extent, and value of Sidley's services to the Committee. Accordingly, the Application should be approved.

RESERVATION OF RIGHTS

35. Sidley reserves the right to modify, amend, or supplement this Application at any time before the hearing on this Application.

NOTICE

36. Pursuant to the Interim Compensation Order, the Interim Fee Application is being served upon the Notice Parties and all parties that have requested notice in this Chapter 11 case pursuant to Bankruptcy Rule 2002. Sidley submits that, in light of the nature of the relief requested, no other or further notice need be given.

[Remainder of page intentionally left blank]

WHEREFORE, Sidley respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, (a) approving the Interim Fee Application; (b) awarding Sidley compensation for professional services to the Committee during the Interim Fee Period in the amount of \$1,957,009.95; (c) awarding Sidley reimbursement of expenses during the Interim Fee Period in the amount of \$23,156.48; (d) authorizing payment of such sums to Sidley pursuant to the Interim Compensation Order; and (e) granting such other and further relief as the Court may deem just and proper.

Dated: April 21, 2021

Respectfully submitted,

SIDLEY AUSTIN LLP

/s/ Juliana L. Hoffman

Matthew A. Clemente (admitted *pro hac vice*)

Dennis M. Twomey (admitted *pro hac vice*)

One South Dearborn Street

Chicago, Illinois 60603

Telephone: (312) 853-7000

Facsimile: (312) 853-7036

-and-

Penny P. Reid

Paige Holden Montgomery

Juliana L. Hoffman

2021 McKinney Avenue

Suite 2000

Dallas, Texas 74201

Telephone: (214) 981-3300

Facsimile: (214) 981-3400

*Counsel For the Official Committee of Unsecured
Creditors*

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

**ORDER GRANTING FIFTH INTERIM FEE APPLICATION OF SIDLEY AUSTIN LLP,
ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM DECEMBER 1, 2020 THROUGH AND INCLUDING FEBRUARY 28, 2021**

Upon consideration of the application (“Application”)² of Sidley Austin LLP (“Sidley”) for allowance of compensation for professional services rendered in the above captioned Chapter 11 Case during the period from December 1, 2020 through and including February 28, 2021 (the “Fee Period”), it is HEREBY ORDERED THAT:

1. Sidley is granted interim allowance of compensation in the amount of \$1,957,009.95 for the Interim Fee Period.

2. Sidley is granted interim allowance of reimbursements for expenses incurred in the amount of \$23,156.48 for the Interim Fee Period.

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

² Each capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Application.

3. The Debtor is authorized and directed to remit payment to Sidley of such allowed compensation and expense reimbursement amounts, less any and all amounts previously paid on account of such fees and expenses.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

End of Order

Exhibit B

Clemente Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

**Objection Deadline: May 12, 2021 at 5:00 p.m. (CT)
Hearing Date: TBD**

**DECLARATION OF MATTHEW A. CLEMENTE IN SUPPORT OF THE FIFTH
INTERIM FEE APPLICATION OF SIDLEY AUSTIN LLP, ATTORNEYS
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM DECEMBER 1, 2020 THROUGH AND INCLUDING
FEBRUARY 28, 2020**

I, Matthew A. Clemente, being duly sworn, state the following under penalty of perjury:

1. I am a partner of the law firm Sidley Austin LLP (“Sidley” or the “Firm”) located at One South Dearborn Street, Chicago, Illinois 60603.

2. I have reviewed the foregoing fifth interim fee application of Sidley for compensation as attorneys for the Official Committee of Unsecured Creditors (the “Application”).² To the best of my knowledge, information and belief, the statements contained in the Application are true and correct.

3. The following statement is provided in response to the questions set forth in paragraph C.5 of the U.S. Trustee Guidelines:

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

- a. As previously disclosed, Sidley and the Committee agreed to ten percent (10%) reduction of Sidley's standard hourly billing rates for this engagement.
- b. The fees requested in the Application were not higher by 10% or more than the fees budgeted for the Interim Fee Period.
- c. None of the professionals included in the Application varied their hourly rate based on the geographic location of the Debtor's Chapter 11 Case.
- d. Sidley is not requesting compensation for the review or revision of time records or the preparation, review and revision of invoices that is not related to the preparation of applications for compensation.
- e. The time period covered by the Application for the Interim Fee Period includes approximately 9.80 hours with a value of \$8,692.00 spent to ensure the time entries subject for the Interim Fee Period do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Sidley's preparation of each monthly application.
- f. The Application does include rate increases since the date of Sidley's retention in these chapter 11 cases as particularly noted in the *Application for Employment of Sidley Austin LLP as counsel to the Official Committee of Unsecured Creditors*.

4. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between Sidley and any other entity or person, other than members of the Firm, for the sharing of compensation received or to be received for services rendered in or in connection with this Chapter 11 Case.

5. All professional and paraprofessional services for which Sidley is requesting compensation were rendered solely on behalf of the Official Committee of Unsecured Creditors.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: April 21, 2021
Chicago, Illinois

/s/ Matthew A. Clemente

Matthew A. Clemente
Sidley Austin LLP

Exhibit C

Fees Statement

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
05 Committee Meetings			
12/01/20	MA Clemente	Participate in call with the board and Committee	.70
12/01/20	EA Bromagen	Weekly call with Board and Committee (.7); draft email to committee regarding agenda for meeting and emails with Sidley and FTI teams regarding same (.5); discuss various issues with G. Demo (.1); further emails with FTI and Sidley agenda for meeting with Committee (.3)	1.60
12/01/20	PH Montgomery	Weekly call with board and Committee	.70
12/01/20	DM Twomey	Participate in weekly UCC/Board call	.70
12/02/20	CM Rognes	Attend UCC call (in part)	.50
12/02/20	DM Twomey	Conference call with UCC and advisors, M. Kirschner re plan trust and other case issues (1.2); review materials for same (.1)	1.30
12/02/20	MA Clemente	Participate in committee meeting	1.20
12/02/20	J Hoffman	Participate on call with committee	1.20
12/02/20	A Russell	Attend weekly Committee meeting	1.20
12/02/20	EA Bromagen	Participate in call with Committee (in part)	1.00
12/02/20	PP Reid	Participate in UCC call	1.20
12/02/20	PH Montgomery	Participate in call with UCC	1.20
12/07/20	EA Bromagen	Emails with G. Demo and Committee regarding scheduling for meeting with Board	.20
12/08/20	J Hoffman	Review docket for case updates (0.2); update case calendar (0.2); correspondence with Debtor's counsel re: emergency hearing (0.1)	.50
12/08/20	EA Bromagen	Emails with G. Demo, Committee and FTI team regarding scheduling of Board meeting (.3); discuss same with E. Cheng (.1)	.40
12/09/20	A Russell	Attend weekly Committee meeting.	1.00
12/09/20	J Hoffman	Attend weekly Committee meeting to stay apprised of case updates	1.00
12/09/20	MA Clemente	Participate in committee meeting regarding various issues and updates	1.00
12/09/20	EA Bromagen	Emails with Committee regarding filings	.20
12/09/20	PP Reid	Participate in weekly creditors committee call regarding	1.00

SIDLEY AUSTIN LLP

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		various issues and updates	
12/09/20	PH Montgomery	Participate in weekly status call with the UCC	1.00
12/09/20	EA Bromagen	Weekly call with Committee regarding various issues	1.00
12/09/20	CM Rognes	Attend weekly UCC call regarding various issues	1.00
12/11/20	EA Bromagen	Emails with Committee regarding updates on various items (.2); emails with J. Hoffman regarding filing of objection and joinder (.1)	.30
12/16/20	CM Rognes	Attend weekly UCC call	.40
12/16/20	EA Bromagen	Email agenda for meeting to committee (.2); weekly meeting with Committee regarding various issues (.4); prepare for same (.1)	.70
12/16/20	MA Clemente	Attend committee meeting	.40
12/16/20	PP Reid	Participate in committee meeting	.40
12/16/20	PH Montgomery	Participate in UCC meeting	.40
12/16/20	J Hoffman	Participate on UCC meeting for to take meeting minutes	.40
12/16/20	A Russell	Attend weekly Committee meeting.	.40
Task Subtotal			24.20
06 Business Operations			
12/10/20	A Russell	Telephone conference with M. Clemente and E. Bromagen re Dondero motion re non-ordinary course transactions and strategy re same (.4); correspond with same re draft objection (.2); review, analyze same (.3); correspond with Committee re update re same (.2); review, and analyze Dondero motion re Committee response (.7); correspond with Pachulski re Debtor's objection to Dondero ordinary course transaction (.2); review, analyze Debtor's draft objection to Dondero motion (.4).	2.40
12/11/20	A Russell	Review, revise objection to Dondero's non-ordinary course transaction motion (3.1); correspond with Sidley team re comments to same, coordination of filing (.6); correspond with Committee re same (.2); review, analyze comments and revised drafts of same (.7); correspond with Pachulski re timing of Debtor's objection (.2).	4.80
12/15/20	A Russell	Review, comment on joinder to Debtor's objection to NPA/CLO motion re trades (.2); correspond with Sidley team re same (.1).	.30
12/16/20	DM Twomey	Emails with FTI/Sidley regarding proposed Select fund payments	.20

SIDLEY AUSTIN LLP

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
12/16/20	EA Bromagen	Discuss various issues with G Demo (.1); emails with M. Clemente, A. Russell, and D. Twomey regarding various issues (.3)	.40
12/16/20	MA Clemente	Analysis of Select information (.4); address emails from FTI re: Select information and related issues (.4)	.80
12/16/20	A Russell	Attend hearing on CLO/NPA motion re trade restrictions (1.8); review, analyze update re Debtor's motion to prepay loan (.2); correspond with Sidley and FTI teams re same (.3).	2.30
12/17/20	DM Twomey	Emails with team, UCC regarding Multistrat payment request	.20
12/17/20	MA Clemente	Call with J. Pomerantz re: Select (.1); call with J. Seery re: Select (.3); further call with J. Pomerantz re: Select (.2); email with A. Bromagen and A. Russell re: Select notes and open issues (.2); analysis of proposed loan to MS (.5); email with J. Pomerantz re: Select (.1); review protocols (.4)	1.80
12/17/20	EA Bromagen	Discuss proposed transaction with A. Russell and D. O'Brien (.5); discussions regarding same with M. Clemente (.3); review documents and emails with Sidley and FTI teams regarding same (1.1); further emails with M. Clemente and A. Russell regarding same (.2); further emails with M. Clemente and A. Russell regarding same and examine documents regarding same (.5)	2.60
12/17/20	A Russell	Telephone conference with Sidley and FTI teams re Debtor's proposed payment of affiliate demand notes (.6); correspond with same re issues re note demands (.5); analyze same (.4).	1.50
12/18/20	EA Bromagen	Emails with P. Montgomery and P. Reid regarding proposed transaction (.2); discuss same with M. Clemente (.3); review documents regarding same and emails with FTI regarding same (.7); review of documents regarding proposed payment of note and emails with Sidley team regarding same (1.1); multiple calls with D. O'Brien regarding same (.2); emails with Sidley litigation team regarding proposed transactions (.4)	2.90
12/18/20	A Russell	Review, analyze issues re proposed note repayments and potential litigation implications (.7); correspond with Sidley and FTI teams re same (.5).	1.20
12/19/20	EA Bromagen	Consider proposed payment on note and email to M. Clemente regarding same	.20
12/21/20	EA Bromagen	Review valuation reports and emails with M. Clemente and D. O'Brien regarding Select notes payment (.5); review DAF documents, depositions regarding previous transfers (.9)	1.40
12/21/20	EA Bromagen	Consider proposed payment of note (.4); emails with M. Clemente and A. Russell regarding same (.2)	.60

SIDLEY AUSTIN LLP

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Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
12/22/20	A Russell	Correspond with E. Bromagen and M. Clemente re Select note payments.	.20
12/22/20	EA Bromagen	Emails with G. Demo and Sidley team regarding payment of Select notes	.10
12/24/20	MA Clemente	Analysis of loan to Select to repay notes	.60
12/28/20	MA Clemente	Analysis of claimant trust assets and various holdings	.60
12/30/20	MA Clemente	Call with J. Seery re: various issues including asset monetization	1.00
12/30/20	EA Bromagen	Review summary of debtor assets prepared by FTI (.5); emails with D. Pauker and G. Demo re same (.2)	.70
Task Subtotal			26.80
07 Case Administration			
12/01/20	MA Clemente	Address agenda for committee call (.2); emails with A. Russell re: litigation trustee and related issues (.3); emails with E. Bromagen re: agenda and related issues (.3)	.80
12/01/20	DM Twomey	Emails with M. Kirschner regarding update, tomorrow's UCC call (.20); emails with team regarding UCC call agenda (.10); emails with Sidley/FTI teams regarding Kirchner materials, assumption/rejection issue, other case issues (.30)	.60
12/01/20	A Russell	Correspond with Sidley team re agenda for 12/2 UCC meeting.	.20
12/01/20	J Hoffman	Update case calendar with revised dates and deadlines	.20
12/02/20	DM Twomey	Pre-call (in part) with FTI and Sidley teams re preparation for upcoming UCC call	.40
12/02/20	MA Clemente	Call with FTI to prepare for committee meeting	.50
12/02/20	MA Clemente	Prepare for committee meeting	1.50
12/02/20	A Russell	Telephone conference (in part) with Sidley and FTI teams re preparation and coordination for Committee meeting	.40
12/02/20	EA Bromagen	Pre committee call with Sidley and FTI team	.50
12/03/20	J Hoffman	Research 9006 deadlines	.10
12/06/20	MA Clemente	Review plan schedule and timing including filing deadlines	.30
12/07/20	MA Clemente	Call with S. Starr re: various issues	.30
12/07/20	MA Clemente	Call with Sidley team and FTI regarding case issues (.7); correspond with Sidley and FTI team regarding same (.3)	1.00
12/07/20	MA Clemente	Call with J. Seery re: various issues	.30
12/07/20	DM Twomey	Weekly conference call with FTI/Sidley teams regarding case	.70

SIDLEY AUSTIN LLP

Invoice Number: 41001500
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Restructuring

Date	Name	Narrative	Hours
		issues	
12/07/20	A Russell	Telephone conference with Sidley and FTI teams re current case issues (.7); correspond with Sidley and FTI teams regarding same (.3)	1.00
12/07/20	EA Bromagen	Discuss various issues with G. Demo (.3); emails with Sidley team regarding same issues (.3)	.60
12/08/20	MA Clemente	Address board scheduling	.20
12/08/20	EA Bromagen	Emails with Sidley team, FTI team, and Committee regarding weekly committee meeting agenda, draft same	.40
12/09/20	DM Twomey	Review Debtor motion, related filings (.40); correspond with M. Clemente regarding same, upcoming hearing (.20); emails with team regarding status update, tomorrow's hearing (.20)	.80
12/09/20	CM Rognes	Attend UCC pre-call (in part) with FTI and Sidley	.40
12/09/20	A Russell	Telephone conference with Sidley and FTI teams to prepare for Committee meeting (.5); correspond with Sidley team regarding same (.2)	.70
12/09/20	J Hoffman	Review, revise new case pleadings and update case calendar in connection with same	.20
12/09/20	MA Clemente	Prepare for committee meeting (1.1); emails from A. Russell re: committee communication (.2); call with FTI prepare for committee meeting (.5)	1.80
12/09/20	EA Bromagen	Pre call with Sidley and FTI team regarding weekly Committee call	.50
12/10/20	J Hoffman	Prepare transcript request form (0.2); correspondence with clerk re: same (0.1); review docket for case updates, pleadings (0.1)	.40
12/11/20	J Hoffman	Review transcript (0.1); confer with court re: transcripts details (0.2)	.30
12/13/20	MA Clemente	Email with E. Bromagen re: committee issues (.2); emails with A. Russell re: open issues to be addressed with D. Pauker and claimaint trust (.3)	.50
12/14/20	A Russell	Telephone conference with Sidley and FTI teams re current case issues (.4); correspond with Sidley team regarding same (.1)	.50
12/14/20	DM Twomey	Weekly call with FTI and Sidley teams re case issues, upcoming depositions, hearing (.40); emails with team re objection to NPA motion (.20)	.60
12/14/20	J Hoffman	Confer with debtor counsel re: status of hearing (0.1); correspondence with FTI team re: same (0.1)	.20

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Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
12/14/20	MA Clemente	Call with FTI and Sidley team re: various issues (.4); emails with Sidley team regarding same (.1)	.50
12/14/20	EA Bromagen	Weekly call with Sidley and FTI teams regarding various issues	.40
12/14/20	EA Bromagen	Emails with G. Demo, M. Clemente, and FTI regarding scheduling Board call	.30
12/15/20	MA Clemente	Email with E. Bromagen re: Foley fee application (.1); call with J. Pomerantz re: various issues (.3)	.40
12/15/20	J Hoffman	Review objection, joinder to Debtor motion (0.2); finalize and file same (0.1)	.30
12/16/20	DJ Lutes	Review emails from E. Bromagen, M. Abdul-Jabbar and J. Hoffman regarding hearing status, complaint status and related deadlines	.20
12/16/20	J Hoffman	Correspondence with court clerk re: minute entry for joinder (0.1) confer with debtor counsel re: hearing dial-in (0.1); update case calendar (0.1)	.30
12/16/20	A Russell	Telephone conference with Sidley and FTI teams to coordinate and prepare for Committee meeting.	.40
12/16/20	MA Clemente	Call with FTI re: preparation for committee call (.4); prepare for committee call (.6)	1.00
12/16/20	EA Bromagen	Call with FTI and Sidley regarding committee meeting	.40
12/16/20	CM Rognes	Attend pre-UCC call (in part) with Sidley and FTI	.30
12/17/20	J Hoffman	Draft, finalize minutes from Committee Meeting	.80
12/17/20	MA Clemente	Calls with E. Bromagen re: various issues including Select	.40
12/17/20	EA Bromagen	Discuss various issues with G. Demo (.2); emails with M. Clemente and A. Russell regarding various issues (.4); emails with Committee and Pachulski regarding scheduling (.1)	.70
12/18/20	DJ Lutes	Correspondence with Sidley team regarding status, hearings and deadlines (.1); review materials for timing, background and status (.2)	.30
12/18/20	J Hoffman	Review, finalize proposed order for lodgment (0.2); correspondence with clerk re: order on motion to seal (0.1)	.30
12/18/20	EA Bromagen	Emails with Committee and Pachulski regarding scheduling meeting	.20
12/21/20	MA Clemente	Call with FTI team re: various issues (.9); analysis of committee dynamic (.6)	1.50
12/21/20	A Russell	Telephone conference with Sidley and FTI teams re case issues (.9); correspond with M. Clemente and E. Bromagen re	1.20

SIDLEY AUSTIN LLP

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		scheduling for the holiday week, including a Committee/Board meeting (.3).	
12/21/20	EA Bromagen	Call with FTI and Sidley teams regarding various issues	.90
12/21/20	EA Bromagen	Discuss various case issues with G Demo	.20
12/22/20	J Hoffman	Correspondence with debtor counsel to receive hearing transcripts	.10
12/22/20	DJ Lutes	Review case updates, call updates, deadlines, and calendaring	.20
12/22/20	MA Clemente	Email with E. Bromagen and A. Russell re: transcripts (.1); call with E. Bromagen re: committee call and various related issues (.3); call with J. Pomerantz re: various issues (.4)	.80
12/22/20	EA Bromagen	Discuss various issues with M. Clemente (.3); emails with Committee members regarding scheduling (.2); calls and emails with D. O'Brien regarding Debtor asset listing (.2)	.70
12/23/20	J Hoffman	Draft correspondence to Court regarding unsealing documents (0.1); multiple calls with court re: sealing of adversary pleadings (0.2)	.30
12/23/20	MA Clemente	Call with E. Bromagen re: discussion with S. Ellison at Frontier bank (.3); email to team re: call with S. Ellison (.2); call with J. Seery re: various issues (.7)	1.20
12/24/20	DJ Lutes	Emails with R. Hoffman and E. Bromagen regarding notice for rate change (.1); review materials and procedures for same (.1); review pending items, claim settlement updates and deadlines (.2); prepare electronic files for Sidley team (.1)	.50
12/24/20	EA Bromagen	Discuss various case issues with M. Clemente	.20
12/24/20	J Hoffman	Correspondence with P. Montgomery, M. Clemente re: filing of sealed documents (0.1); review updates for Committee (0.3); correspondence with KCC team re: service of pleadings and timing requirements (0.2); review new pleadings and case deadlines (0.2); update case calendar with same (0.1)	.90
12/24/20	MA Clemente	Detailed email to the committee re: various updates (.9); correspond with E. Bromagen re: various case issues (.3)	1.20
12/26/20	DJ Lutes	Update electronic files and case administrative tasks for Sidley team	.20
12/26/20	EA Bromagen	Review docket and emails with J. Hoffman regarding filing of supplemental declaration	.20
12/28/20	J Hoffman	Call with T. Ellison re: filing of adversary pleadings (0.1); correspondence to P. Montgomery re: court filings (0.2); confer with KCC team re: service of pleadings (0.1); email correspondence with court re: adversary complaint (0.1); review pleadings and correspondence from court in connection	.70

SIDLEY AUSTIN LLP

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		with Dondero TRO hearing (0.1); update case calendar re: same (0.1)	
12/28/20	A Russell	Telephone conference with Sidley and FTI team re current case issues.	.60
12/28/20	DM Twomey	Weekly conference call with FTI/Sidley teams regarding case issues	.60
12/28/20	MA Clemente	Call with FTI re: various issues	.60
12/28/20	EA Bromagen	Review docket for adversary case and emails with docketing team re same (.1); call with FTI and Sidley teams re various issues (.6); discuss various issues with G. Demo (.4); emails with A Russell re same (.1); discuss various issues with E. Cheng (.1); review filings in Dondero adversary proceedings (.5)	1.80
12/29/20	J Hoffman	Correspondence with clerk re: adversary complaint (0.1); confer with N. Cade re: filing amended complaint (0.2); research re: same (0.4)	.70
12/29/20	MA Clemente	Address and respond to committee dynamic	.40
12/30/20	J Hoffman	Correspondence with Committee members re: January 6 hearing (0.1); review new pleadings filed to update case calendar (0.2)	.30
12/31/20	MA Clemente	Call with J. Pomerantz re: various issues	.40
12/31/20	MA Clemente	Analysis of information from P. Daugherty	1.10
12/31/20	J Hoffman	Correspondence with FTI re: hearing dates (0.1); confer with Debtor counsel re: same (0.1); update case calendar (0.1); correspondence with clerk re: hearing on PI motion (0.1); confer with P. Montgomery re: same (0.1); research regarding service and notice deadlines for PI motion (0.1)	.60
Task Subtotal			42.20
08 Claims Administration and Objections			
12/03/20	A Russell	Review, analyze stipulation withdrawing J. Dondero claims with prejudice.	.20
12/15/20	A Russell	Correspond with FTI re questions re claims.	.30
12/16/20	MA Clemente	Review claims materials from FTI	.60
12/22/20	MA Clemente	Analysis of Harborvest claims	.70
12/23/20	A Russell	Correspond with Sidley team re Harbourvest claim settlement (.3); analyze docket filings re same (.3).	.60
12/23/20	MA Clemente	Read HarborVest settlement papers (.4); email to team re: HV (.1); analysis of issues regarding HV settlement (1.1)	1.60

SIDLEY AUSTIN LLP

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
12/24/20	EA Bromagen	Review Debtor's motion to settle Harbourvest claim and emails with M. Clemente regarding same (.8); further review of proposed settlement and emails with M. Clemente regarding same (.4)	1.20
12/24/20	A Russell	Correspond with M. Clemente and E. Bromagen re terms of Harbourvest claim settlement.	.20
12/24/20	MA Clemente	Emails with E. Bromagen re: HV settlement (.4); review additional HV pleadings and proof of claim (1.1)	1.50
12/29/20	MA Clemente	Assess HV voting impact (.3); review HV proofs of claim as relates to settlement (.9)	1.20
Task Subtotal			8.10
09 Corporate Governance and Board Matters			
12/01/20	A Russell	Correspond with E. Bromagen re update from UCC/Board meeting.	.20
12/18/20	EA Bromagen	Call with Board and Committee regarding various issues (.7); correspondence with Sidley team regarding same (.1)	.80
12/18/20	A Russell	Attend weekly Board meeting with Committee (.7); correspond with Sidley and FTI teams re follow up from same (.3).	1.00
12/18/20	DM Twomey	Emails with Sidley team regarding board discussion, follow-up questions	.20
12/18/20	PP Reid	Participate in Board call with Committee regarding various issues	.70
12/18/20	PH Montgomery	Attend Board call with Committee regarding various issues	.70
Task Subtotal			3.60
11 Retention			
12/15/20	MA Clemente	Call with E. Bromagen re: Foley fee application (.3); review Foley fee application and issues (.4); emails with E. Bromagen re: Foley fee application (.3)	1.00
12/23/20	MA Clemente	Review supplemental rate declaration (.2); email with E. Bromagen re: same (.1)	.30
12/24/20	EA Bromagen	Draft and file supplemental declaration in support of Sidley retention notice of rate change (.5); emails with accounting and J. Hoffman regarding same (.1)	.60
12/24/20	J Hoffman	Correspondence with E. Bromagen re: declaration requirements for rate change (0.1); confer with D. Lutes re: same (0.1); review, revise declaration in connection with rate change (0.3); finalize declaration for filing (0.1)	.60
12/24/20	MA Clemente	Review fee update declaration	.30

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Date	Name	Narrative	Hours
12/26/20	J Hoffman	Correspondence with E. Bromagen re: declaration filing (0.1); file declaration in support of rate increase (0.1)	.20
Task Subtotal			3.00
12 Fee Applications			
12/01/20	DJ Lutes	Emails with S. Caputo regarding ledes materials and status of monthly materials (.1); update electronic files for Sidley team (.1); emails with Sidley team regarding monthly materials (.1)	.30
12/03/20	DJ Lutes	Prepare monthly fee application exhibits and materials (.3); review costs for compliance (.1); emails with S. Caputo regarding same (.1)	.50
12/03/20	MA Clemente	Evaluate fee application issues	.50
12/03/20	J Hoffman	Review, revise fee application (0.2); correspondence with FTI re: 12th monthly fee application (0.1); correspondence with Committee re: fee application review (0.1)	.40
12/04/20	DJ Lutes	Prepare monthly fee application exhibits and materials	2.20
12/05/20	DJ Lutes	Prepare monthly fee application exhibits and materials (.2); prepare interim fee application materials (.6)	.80
12/07/20	DJ Lutes	Prepare monthly fee application exhibits and materials	4.10
12/07/20	J Hoffman	Finalize and file monthly fee application	.30
12/08/20	DJ Lutes	Prepare monthly fee application exhibits and materials	1.90
12/09/20	DJ Lutes	Prepare monthly fee application exhibit and materials	1.60
12/10/20	DJ Lutes	Prepare monthly fee application exhibit and materials (.3); emails with S. Caputo regarding same (.1); emails with J. Hoffman regarding monthly fee applications (.1)	.50
12/10/20	J Hoffman	Review fee applications (0.1); confer with D. Lutes re: hourly rates (0.1)	.20
12/14/20	DJ Lutes	Prepare monthly fee application exhibit and materials (2.0); emails with S. Caputo regarding same (.1); emails with P. Foley regarding same (.1); prepare interim fee application materials (.2)	2.40
12/14/20	A Russell	Correspond with M. Clemente and E. Bromagen re status of Foley fee applications in response to Committee member inquiry.	.30
12/15/20	DJ Lutes	Prepare 3rd interim fee application materials (.7); email to K. Cortez regarding interim blended rates (.1)	.80
12/16/20	DJ Lutes	Prepare interim fee application materials	.40
12/17/20	DJ Lutes	Prepare interim fee application and exhibits	.30

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Date	Name	Narrative	Hours
12/18/20	DJ Lutes	Emails with P. Foley regarding monthly fee application (.1); prepare monthly and interim fee application materials and exhibits (.2)	.30
12/21/20	DJ Lutes	Prepare monthly fee statement and exhibits	1.70
12/22/20	J Hoffman	Draft CNOs for fee applications (0.4); file CNOs for fee applications (0.2); review, revise Sidley, FTI fee applications (0.5); correspondence with Committee re: same (0.1); advise FTI re: interim compensation procedures (0.3)	1.50
12/22/20	DJ Lutes	Prepare monthly fee statement, materials and exhibits (.2); emails to M. Clemente regarding same (.1)	.30
12/22/20	MA Clemente	Review fee application (.5); email with DJ Lutes re: fee application (.1)	.60
12/23/20	DJ Lutes	Emails with S. Caputo regarding monthly fee application exhibit and materials (.2); review materials for same and for interim fee application (.2)	.40
12/23/20	A Russell	Correspond with M. Clemente and E. Bromagen re supplemental declaration for Sidley retention and analyze same.	.30
12/24/20	DJ Lutes	Prepare monthly fee application materials (.2); emails with S. Caputo regarding same (.1)	.30
12/24/20	J Hoffman	Finalize and file FTI, Sidley fee applications	.60
12/31/20	DJ Lutes	Emails with E. Delgado regarding monthly fee applications (.1); review calculations for same (.2)	.30
Task Subtotal			23.80

14 Litigation

12/01/20	M Abdul-Jabbar	Attend and participate in team litigation meeting with Sidley and FTI concerning CLO Holdco and related filings (.9); review 106 documents, emails and related attachments pertaining to CLO Holdco production (.9)	1.80
12/01/20	CM Rognes	Confer with FTI, P. Montgomery, and P. Foley re: CLO Holdco investigation (0.9); correspond with P. Montgomery, FTI, DSI, and Debtor's counsel re: financial documents (0.5); research re: work product privilege (0.1)	1.50
12/01/20	MA Clemente	Address discovery email from J. Morris (.2); review M. Kirschner memo (.4); address potential CLOH options (.5)	1.10
12/01/20	PH Montgomery	Weekly call with board and Committee (.7); call with FTI and Sidley teams re adversary issues (.9); call with J. Morris, FTI and DSI regarding document issues (.5) ; review of documents related to adversary proceeding (1.6)	3.70

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Date	Name	Narrative	Hours
12/01/20	PG Foley	Correspondence with Sidley team regarding Debtor document production (.5); review of documents related to same (1.7)	2.20
12/01/20	PG Foley	Participate in UCC professionals call regarding CLO Holdco (.9); related correspondence with FTI and Sidley teams regarding same (.2)	1.10
12/02/20	PP Reid	Participate in professional call for UCC call (.5); emails with FTI and Sidley team regarding CLO Holdco investigation (.3)	.80
12/02/20	M Abdul-Jabbar	Research injunctive relief (2.1); begin draft of motion for preliminary injunction (1.8)	3.90
12/02/20	CM Rognes	Draft outline re: CLO Holdco complaint (1.0); research re CLO Holdco complaint (1.4); document review re: CLO Holdco (1.0)	3.40
12/02/20	J Hoffman	Research in connection with adversary complaint drafts	.20
12/02/20	PH Montgomery	Call with FTI in preparation for UCC call (.5); review of material regarding adversary proceeding (1.0)	1.50
12/02/20	PG Foley	Attend UCC professionals call regarding CLO Holdco (.5); related correspondence with Sidley and FTI teams regarding same (.1)	.60
12/02/20	EA Bromagen	Research limitations on litigation trust recoveries (2.5); emails with M. Clemente regarding same (.2)	2.70
12/03/20	CM Rognes	Confer with P. Montgomery and committee member re: CLO Holdco investigation (1.5); draft outline re: CLO Holdco complaint (0.7); confer with P. Montgomery re: CLO Holdco investigation and complaint strategy (0.7)	2.90
12/03/20	M Abdul-Jabbar	Review and analyze documents, emails, and attachments related to CLO HoldCo diligence review (2.2); prepare for and participate in strategic call with professional team relating to adversary complaint and injunctive relief (.7); prepare outline and analyze prior briefing related to motion for preliminary injunction (1.6)	4.50
12/03/20	A Russell	Correspond with P. Montgomery re issues re data retention (.2); review, analyze current plan provision re same (.2).	.40
12/03/20	PH Montgomery	Call with C. Rognes regarding adversary issues (.7); call with FTI re same (.5); call with J. Terry re adversary issues (1.5); communications with J. Morris regarding document requests (.4); communications with J. Kane regarding extension for adversary complaint (.2)	3.30
12/03/20	PG Foley	Call with professionals regarding CLO Holdco (.7); review related issues, and documents (.2)	.90
12/03/20	EA Bromagen	Research regarding litigation trust recoveries (.5); correspond	.90

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Date	Name	Narrative	Hours
		regarding same with M. Clemente (.4)	
12/04/20	CM Rognes	Document review (0.3); correspond with P. Montgomery, M. Abdul-Jabbar, and FTI re: CLO Holdco complaint (0.8); correspond with M. Abdul-Jabbar re: CLO Holdco complaint (0.1)	1.20
12/04/20	M Abdul-Jabbar	Review emails and related attachments in connection with CLO Holdco diligence review	1.10
12/04/20	M Abdul-Jabbar	Hold strategic call with FTI and Sidley relating to pending adversary complaint and motion for preliminary injunction (.8); review materials for call (.2)	1.00
12/04/20	C Clark	Review Select document timeline and relativity document search list (.9); identify documents from relativity, not included in the timeline (.6)	1.50
12/04/20	PH Montgomery	Call with FTI regarding adversary issues	1.00
12/04/20	PH Montgomery	Communications with J. Kane regarding pleading extension (.2); review of materials related to adversary complaint (6.4)	6.60
12/04/20	PG Foley	Correspondence with Sidley team and FTI regarding CLO Holdco extension, chronology of relevant documents (.8); correspond with team regarding complaint issues (.1)	.90
12/05/20	CM Rognes	Draft agreed motion to extend CLO Holdco adversary proceeding deadline (1.1); research re: CLO Holdco complaint (1.6)	2.70
12/06/20	M Abdul-Jabbar	Begin drafting motion for preliminary injunction legal standard and argument sections	2.30
12/06/20	CM Rognes	Draft outline re: CLO Holdco complaint	1.70
12/07/20	M Abdul-Jabbar	Revise draft motion for preliminary injunction (1.6); review 416 emails and related attachments in connection with CLO Holdco review (1.9); participate in strategic call with FTI and Sidley relating to litigation (.7); analyze related strategy concerning distribution monies held in court's registry and data collection (.3)	4.50
12/07/20	CM Rognes	Attend weekly professional call with Sidley and FTI (0.7); document review re: CLO Holdco investigation (0.3); draft outline re: CLO Holdco complaint (1.0); research re: CLO Holdco complaint (2.1); correspond with P. Montgomery re: agreed motion for extension of CLO Holdco extension (0.1); correspond with FTI re: fee estimate (0.1)	4.30
12/07/20	PP Reid	Participate in telephone conference (in part) with FTI (.5); emails regarding CLO Holdco brief (.2); review Debtors motion for TRO against Dondero (.2)	.90

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Date	Name	Narrative	Hours
12/07/20	A Russell	Correspond with Sidley, FTI and Committee re update re adversary proceeding against J. Dondero (.3); review, analyze pleadings filed in same (.9).	1.20
12/07/20	PG Foley	UCC professionals call with FTI and Sidley teams regarding status (.7); review related materials for same (.1)	.80
12/07/20	J Hoffman	Review complaint for injunctive relief	.10
12/07/20	PH Montgomery	Call with FTI re status (.7); communications with J. Morris regarding document requests (.2); communications with J. Kane regarding production issues (.2); communications with team regarding document review (.5); review of data related to possible claims (7.0)	8.60
12/07/20	EA Bromagen	Review Debtor's filed motion for TRO and motion for injunctive relief	.60
12/07/20	DM Twomey	Emails with Sidley team regarding draft debtor pleadings (.20); emails with Sidley team and related analysis regarding Dondero motion/protocols (.30)	.50
12/08/20	CM Rognes	Correspond with FTI, P. Montgomery, M. Abdul-Jabbar, and P. Foley re: CLO Holdco investigation (1.0); revise agreed motion for extension re: CLO Holdco deadline (0.4); research re: CLO Holdco complaint (1.0); draft CLO Holdco complaint (4.4); review documents produced by the Debtor (0.1); confer with P. Montgomery re: CLO Holdco complaint (0.5); correspond with P. Montgomery and Debtor's counsel re: document production and retention (0.3)	7.70
12/08/20	PP Reid	Participate in telephone conference (in part) regarding CLO Holdco complaint with FTI	.80
12/08/20	M Abdul-Jabbar	Research potential claims and draft summary of findings with case annotations (3.2); participate in call with Sidley litigation team and FTI regarding litigation strategy and ongoing diligence review (1.0); revise draft motion for preliminary injunction and review case law relating to same (1.3)	5.50
12/08/20	PH Montgomery	Call with FTI regarding adversary (1.0); call with C. Rognes regarding same (.5); call with J. Morris regarding document production (.3); communications with team regarding discovery (.4); communications with B. Clark and J. Kane regarding extension (.2); communications with P. Keiffer and P. McVoy regarding document review issues (.2); correspond with M. Clemente regarding subpoena issues (.2); continue review of possible claims (5.9)	8.70
12/08/20	A Russell	Review docket for updates in Dondero adversary (.2); correspond with M. Clemente and Committee re new pleadings filed in TRO/Dondero adversary (.2); correspond with G. Demo re scheduling of emergency hearing on TRO motion	2.20

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Date	Name	Narrative	Hours
		(.1); review, analyze new pleadings filed in Dondero adversary (1.7)	
12/08/20	PG Foley	Call with FTI and Sidlley team regarding CLO Holdco (1.0); correspondence with Sidley and FTI regarding Debtor production and related review (.6); analyze claims, document production and related issues (2.8)	4.40
12/08/20	J Hoffman	Review, analyze new case pleadings	.10
12/08/20	EA Bromagen	Gather documents and emails with P. Montgomery regarding UBS claim history	.40
12/09/20	PP Reid	Telephone conference with P. Montgomery and M. Clemente regarding adversary and related issues (.5); telephone conference with FTI regarding committee presentation (.5)	1.00
12/09/20	CM Rognes	Draft complaint re: CLO Holdco (1.9); document review re: CLO Holdco (0.2); revise agreed order re: CLO Holdco adversary proceeding deadline (0.3); correspond with M. Abdul-Jabbar re: CLO Holdco complaint (0.1); call with P. Montgomery re: agreed motion (0.1); correspond with J. Hoffman re: agreed motion (0.1)	2.70
12/09/20	M Abdul-Jabbar	Prepare revisions to draft motion for preliminary injunction sections relating to pleadings and causes of action (3.4); research case law and analyze specific facts and supporting documents evidencing each cause of action (3.6); identify specific bases for relief and threshold for securing injunctive relief and a favorable decision on the merits (1.9)	8.90
12/09/20	PH Montgomery	Call with P. Reid and M. Clemente regarding adversary and related issues (.5); call with FTI regarding outstanding issues (.5); call with C. Rognes regarding complaint (.1); communications with P. Keifer and Meta-E regarding discovery issues (.2); communications with J. Morris regarding scheduling issues (.3); review of documents related to potential claims (2.5)	4.10
12/09/20	PG Foley	Participate in weekly UCC professionals call (.5); related correspondence with team regarding same (.2)	.70
12/09/20	PG Foley	Review of Debtor and CLO Holdco productions (6.4); related correspondence with team regarding same (.7)	7.10
12/09/20	J Hoffman	Finalize and file motion to extend deadline (0.2); correspondence with C. Rognes re: same (0.1); upload proposed order (0.1); correspondence with court re: motion and order request (0.1)	.50
12/09/20	MA Clemente	Call with P. Reid and P. Montgomery re: CLOH and related issues (.5); call with J. Pomerantz re: TRO hearing (.3); update email with Sidley team re: TRO issues (.3); strategy regarding	2.00

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Date	Name	Narrative	Hours
		TRO and nexpoint advisors filings (.9)	
12/09/20	EA Bromagen	Discuss motion for TRO and other actions with G. Demo (.2); emails with Sidley and FTI team regarding same (.4)	.60
12/10/20	PP Reid	Participate (in part) in Debtor's TRO hearing	1.90
12/10/20	CM Rognes	Correspond with FTI, P. Montgomery, P. Foley and M. Abdul-Jabbar re: CLO Holdco complaint (0.8); document review re: CLO Holdco (1.5); draft CLO Holdco complaint (2.6); document review re: Debtor (0.2); correspond with M. Abdul-Jabbar re: CLO Holdco complaint (0.2)	5.30
12/10/20	PH Montgomery	Call with FTI regarding adversary proceeding (.9); attend court hearing (2.2); review fund advisor data (.5); review of data related to adversary (2.2); communications with J. Morris regarding document requests (.2);	6.00
12/10/20	M Abdul-Jabbar	Strategic call with Sidley and FTI concerning upcoming hearings and litigation filings (.8); research additional claims and remedies, and revise motion for preliminary injunction (3.3)	4.10
12/10/20	A Russell	Attend hearing on Debtor's emergency motion for TRO against Dondero (2.2); review, analyze pleadings filed by Dondero affiliates re same (.5); correspond with Sidley team re same (.2).	2.90
12/10/20	PG Foley	Attend UCC professionals call regarding CLO Holdco (.8); related correspondence with Sidley and FTI teams regarding same (.4); review of Debtor and CLO Holdco productions (4.1)	5.30
12/10/20	J Hoffman	Attend hearing (in part) on TRO motion in adversary proceeding	1.70
12/10/20	MA Clemente	Participate in hearing on TRO and other items (2.2); emails with A. Russell re: responses to Dondero filings (.3); read TRO pleadings and related filings (.8); prepare for hearing (.5); call with A. Russell and E. Bromagen re: filing a response to Dondero motion and related issues (.4)	4.20
12/10/20	EA Bromagen	Attend hearing on Debtor motion for Dondero TRO	2.20
12/10/20	EA Bromagen	Draft Committee objection to Dondero motion regarding non ordinary course transactions	1.10
12/11/20	CM Rognes	Draft CLO Holdco complaint (5.0); research re: CLO Holdco complaint (0.5); research re: jurisdictional issues (0.3); call with P. Montgomery re: CLO Holdco complaint (0.4); correspond with P. Montgomery re: CLO Holdco complaint (0.6); correspond with J. Hoffman re: jurisdictional issues (0.2); correspond with M. Abdul-Jabbar re: CLO Holdco complaint (0.2)	7.20

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Date	Name	Narrative	Hours
12/11/20	M Abdul-Jabbar	Analyze facts and review underlying source documents re: adversary complaint (2.6); draft section inserts relating to specific causes of action being alleged in connection with injunctive relief request (4.7); review previously briefed, related arguments and objections from CLO Holdco (.5)	7.80
12/11/20	A Russell	Review, analyze deposition notices re 12/16 hearing (.2); correspond with Sidley team re same (.1); correspond with C. Rognes re jurisdiction question re complaint (.1),	.40
12/11/20	J Hoffman	Review, and finalize objection to Dondero motion (0.2); file objection (0.2); correspondence with E. Bromagen re: same (0.1); call with C. Rognes re: creditor proofs of claim in connection with adversary complaint (0.2)	.70
12/11/20	DM Twomey	Emails with Sidley team regarding Dondero 363 motion, responses, related issues	.30
12/11/20	PH Montgomery	Call with C. Rognes regarding complaint (.4); communications with J. Morris regarding document review and calls with Debtor on accounting issues (.3); communications with M. Alleluia regarding subpoena (.2); review and revise draft adversary proceeding and review of related documentation (5.7)	6.60
12/11/20	MA Clemente	Work on revisions to objection and joinder (2.5); review further revised versions of objection (.5); call with E. Bromagen re: draft objection and analysis (.4); several emails with A. Russell and E. Bromagen re: objection strategy and substance (.7); review draft of debtor objection (.5); review deposition notices (.2); analysis of CLOH claims (.8)	5.60
12/11/20	PP Reid	Analyze materials and issues regarding regarding CLO Holdco Complaint (.3); emails with Sidley team regarding same (.2)	.50
12/11/20	EA Bromagen	Review Debtor objection to Dondero protocols motion (.1); review and revise Committee objection to Dondero protocols motion and emails with team regarding same (.4); analyze protocols and notes regarding SSP transaction and email to M. Clemente regarding same (.5); further emails with A. Russell and M. Clemente regarding same (.2); discuss same with M. Clemente (.3)	1.50
12/12/20	M Abdul-Jabbar	Finalize draft motion for preliminary injunction, updating footnotes, preliminary statement and finalizing analysis relating to causes of action against CLO Holdco, and submit to team for review	5.70
12/12/20	MA Clemente	Assess deposition issues	.30
12/12/20	CM Rognes	Draft CLO Holdco complaint (0.7); research re: personal jurisdiction (0.5)	1.20

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Date	Name	Narrative	Hours
12/13/20	CM Rognes	Review causes of action re: CLO Holdco complaint (0.2); revise CLO Holdco complaint (0.2)	.40
12/13/20	PP Reid	Review and revise CLO Holdco complaint (1.1); emails with Sidley team regarding same (.2)	1.30
12/14/20	M Abdul-Jabbar	Correspond with team and C. Rognes regarding draft adversary complaint (1.1); revise draft allegations relating to causes of action and related demands for relief (2.9)	4.00
12/14/20	A Russell	Attend deposition of J. Seery (1.5); attend deposition of J. Dondero (2.0); correspond with Pachulski and Sidley teams re deposition schedule and other housekeeping matters (.5); correspond with Sidley and FTI teams re deposition logistics, transcripts (.3); review, analyze Debtor's motions to quash and for protective order re depositions of J. Dubel and R. Nelms (.3); correspond with Sidley team re 12/15 deposition of D. Norris (.1).	4.70
12/14/20	CM Rognes	Revise CLO Holdco complaint (3.7); attend weekly professionals call with FTI and Sidley (0.4); document review re: CLO Holdco (1.4); correspond with FTI re: Dondero loan (0.1); correspond with M. Abdul-Jabbar re: CLO Holdco complaint (1.1); review local rules re: adversary complaint (0.2)	6.90
12/14/20	PH Montgomery	Call with FTI regarding outstanding tasks (.4); attend Seery deposition (1.5); attend Dondero deposition (2.0); draft, review and revise adversary complaint including related communications with M. Abdul-Jabar and C. Rognes (3.2)	7.10
12/14/20	MA Clemente	Participate in Seery Deposition (1.5); participate in Dondero deposition (2.0); review draft complaint (.5); read motion to quash and response (.4)	4.40
12/14/20	PP Reid	Telephone conference with FTI and Sidley teams regarding outstanding tasks (.4); emails with Sidley team regarding same (.1); review revised CLO complaint (.7); participate in Seery deposition (1.5); attend Dondero's deposition (2.0); review deposition materials for same (.3)	5.00
12/14/20	EA Bromagen	Review Foley final fee application and email with comments to M. Clemente regarding same (.5); review debtor's response to HCMFA/Nexpoint Motion on CLO management (.5)	1.00
12/14/20	PG Foley	CLO Holdco-related document review and issue analysis (6.9); correspondence with Sidley team regarding same (.3)	7.20
12/14/20	PG Foley	Attend weekly UCC professionals call with Sidley and FTI regarding various issue (.4); related correspondence with Sidley team regarding same (.1)	.50
12/15/20	PH Montgomery	Review and revise complaint (6.1); calls with C. Rognes	7.50

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Date	Name	Narrative	Hours
		regarding complaint, subpoenas and accounting information (1.0); call with M. Clemente regarding witness interview (.3); call with J. Morris regarding same (.1)	
12/15/20	MA Clemente	Attend D. Norris deposition (2.7); call with P. Montgomery re: D. Klos (.3); revisions to CLOH complaint (1.2); team email re: CLO complaint (.2); review joinder to debtor objection to NXPA motion (.2); email with Sidley team re: joinder (.1)	4.70
12/15/20	PP Reid	Participate in Norris deposition (2.7); correspond with Sidley and FTI teams regarding CLO Holdco complaint revisions (.5)	3.20
12/15/20	CM Rognes	Research re: requested relief (1.8); review FTI complaints re: CLO Holdco complaint (0.3); draft agenda re: CLO Holdco team call (0.2); revise complaint re: CLO Holdco (2.3); correspond with P. Montgomery re: complaint (0.3); attend CLO Holdco team call with FTI and M. Abdul-Jabbar (0.9); document review re: CLO Holdco (0.4); call with P. Montgomery re: CLO Holdco (0.5); call with P. Montgomery re: accounting information (0.5)	7.20
12/15/20	A Russell	Attend deposition of D. Norris re CLOs' motion (2.7); review materials for same (.1)	2.80
12/15/20	M Abdul-Jabbar	Participate in call with FTI analyzing select documents and correspondence relating to CLO Holdco and fraudulent transfer claims (.7); draft argument and incorporate select documents and related analysis into motion for injunctive relief (4.7)	5.40
12/15/20	EA Bromagen	Review transcripts of depositions J. Seery and J. Dondero (1.5); draft and revise joinder to Debtor's response to HCMFA motion (.4); emails with J. Hoffman regarding filing of same (.1); discussions regarding Foley final fee application with A. Chiarello (.3); discussions with M. Clemente regarding same (.4); emails with M. Clemente regarding same (.2)	2.90
12/15/20	PG Foley	Call regarding CLO Holdco with Sidley team and FTI	.70
12/16/20	PP Reid	Teleconference with FTI regarding briefing and committee meeting (.40); participate in hearing on Dondero's motion (1.60); emails regarding CLO Holdco complaint (.50); review materials in connection to CLO Holdco (0.3)	2.80
12/16/20	CM Rognes	Research re: standing (2.4); revise complaint re: CLO Holdco (2.0); document review re: CLO Holdco (0.4); attend accounting call with Debtor (0.7); review protective order (0.2); correspond with P. Montgomery and M. Abdul-Jabbar re: CLO Holdco complaint (1.4)	7.10
12/16/20	J Hoffman	Prepare for and attend omnibus hearing	1.50
12/16/20	M Abdul-Jabbar	Review draft of CLO Holdco complaint and revise causes of action and corresponding facts and requests for relief (2.8);	8.80

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Date	Name	Narrative	Hours
		research additional doctrine and provide further analysis (3.2); revise motion for preliminary injunction (2.8)	
12/16/20	EA Bromagen	Attend hearing on Nexpoint/HCMFA motions	1.70
12/16/20	EA Bromagen	Review and comment on draft complaint against CLOH (1.5); emails with M. Abdul-Jabbar, P. Montgomery regarding related issues (.5)	2.00
12/16/20	MA Clemente	Address emails from litigation team re: CLOH complaint (.4); analysis of Dugaboy note and CLOH transaction (.9)	1.30
12/16/20	MA Clemente	Participate in hearing on CLO motion	1.60
12/16/20	PG Foley	Calls and correspondence with Sidley team regarding CLO Holdco, related complaint and preliminary injunction (.7); prepare materials relating to CLO Holdco (1.4)	2.10
12/16/20	PH Montgomery	Call with FTI regarding outstanding tasks (.4); call with J. Morris and Debtor representatives re accounting issues (.7); call with C. Rognes and M. Abdul-Jabar regarding revisions to MTD (1.4); communications with M. Alleluia re document retention notice (.1) ; attend hearing on Dondero motion (1.6); communications with committee members regarding CLO Holdco filing (.2); review and revise complaint and preliminary injunction motion (3.6)	8.00
12/16/20	DM Twomey	Emails with Sidley team regarding CLO complaint, motion to modify TRO	.20
12/16/20	A Russell	Search adversary docket for Dondero motion to modify TRO (.3); correspond with Sidley team re same (.1); review, analyze same (.2).	.60
12/17/20	PP Reid	Emails with Sidley team regarding CLO Holdco complaint (.30); participate in hearing on Daughtery motion (1.1)	1.40
12/17/20	NP Cade	Cite check and blue book cases in Motion for Preliminary Injunction (3.0); assist with preparation of Appendix ISO of same (1.1); revisions to Motion for Preliminary Injunctions (.8); prepare for and efile Motion to File Under Seal (.8); prepare for submission of pleadings to Judge's law clerk (.4); coordination with Library to retrieve address for several defendants to use for Service of Process (.3)	6.40
12/17/20	CM Rognes	Correspond with M. Abdul-Jabbar and P. Montgomery re: CLO Holdco complaint (0.8); revise CLO Holdco complaint (2.6); draft motion to seal (3.0); research re: service (1.1); correspond with M. Abdul-Jabbar re: alter ego claim (0.2); correspond with M. Abdul-Jabbar re: CLO Holdco complaint (0.4); correspond with E. Bromagen re: motion to seal (0.1); correspond with P. Montgomery and litigation trustee re: complaint (0.2); correspond with P. Montgomery and J.	9.90

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Date	Name	Narrative	Hours
		Hoffman re: motion to seal (1.0); correspond with P. Montgomery re: motion to seal (0.2); additional research re: complaint (0.3)	
12/17/20	J Hoffman	Attend (in part) omnibus hearing (0.8); call with C. Rognes, P. Montgomery (in part) to discuss adversary complaint procedure (0.9); correspondence with C. Rognes re: same (0.2); research rules and procedure for motions to seal (0.4); research service requirements for complaint (0.2); review, revise motion to seal (0.2); revise motion to seal (0.1); review, analyze draft complaint (0.2); call with C. Rognes re: motion to seal (0.8); confer with N. Cade re: filing documents under seal (0.1)	3.90
12/17/20	C Clark	Assemble and label exhibits for Appendix in support of Motion for Preliminary Injunction (5.4); draft Appendix index per same (5.2); prepare plans for filing Motion to Seal (4.4)	15.00
12/17/20	E Nosarios	Search for addresses for service of process	1.00
12/17/20	PH Montgomery	Call with M. Abdul-Jabbar regarding motion for injunction (.2); call with C. Rognes regarding complaint and motion for injunction (1.2) review and revise complaint, motion for preliminary injunction, motion to seal, and appendix re preliminary injunction (7.2)	8.60
12/17/20	MA Clemente	Emails with P. Montgomery re: complaint (.2); attend P. Daugherty lift stay hearing (1.1); analysis of P. Daugherty lift stay papers (.6); call with P. Montgomery re: confidentiality issues (.3); review complaint (.7)	2.90
12/17/20	MA Clemente	Email with P. Montgomery re: complaint (.1); call with E. Bromagen re: complaint (.3); analysis of overall strategy re: CLOH litigation (.6)	1.00
12/17/20	EA Bromagen	Attend hearing regarding Daugherty lift stay motion (1.1); discuss CLOH complaint with C. Rognes (.2); emails with Sidley team regarding same (.2)	1.50
12/17/20	M Abdul-Jabbar	Finalize Motion for Preliminary Injunction (3.3); review documentary evidence in connection with the motion, and update citations relating to same (3.6); confer with litigation team concerning draft appendix (.7); draft declaration and incorporate analysis of CLO Holdco transaction (3.8)	11.40
12/17/20	A Russell	Review correspondence re CLOH complaint (.3); analyze filed version of same (.4).	.70
12/17/20	MA Ruiz	Business and financial research for Dugaboy Investment Trust and Get Good Non-Exempt Trust.	1.00
12/17/20	PG Foley	Review CLOH complaint materials	.50
12/18/20	J Hoffman	Call with C. Rognes to discuss procedure for sealed documents (0.1); research re: notice, service requirements for motion to	.40

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Date	Name	Narrative	Hours
		seal, adversary complaint (0.3)	
12/18/20	NP Cade	Cite check and blue book cases in Motion for Preliminary Injunction (.7); assist with preparation of Appendix ISO of same (.5); revisions to Motion for Preliminary Injunctions (.5); prepare for and efile Motion to File Under Seal (.8); prepare for submission of pleadings to Judge's law clerk (.7)	3.20
12/18/20	CM Rognes	Revise and finalize CLO Holdco complaint and motion for preliminary injunction re: filing under seal (1.8); document review re: CLO Holdco (0.2); confer with P. Montgomery and Debtor's counsel re: confidentiality issues (0.3); correspond with Meta-E re: confidentiality issues (0.1); review appendix re: confidential documents (0.2); correspond with J. Hoffman re: adversary proceeding (0.2); correspond with P. Montgomery re: confidentiality issues (0.3); call with P. Montgomery regarding service (0.2)	3.30
12/18/20	PH Montgomery	Review and revise complaint, preliminary injunction motion, appendix and motion to seal and coordinate filing same (2.3); communications with J. Morris, J. Kane and others re same (.4); correspond with C. Rognes re confidentiality issues (.3); draft correspondence regarding de-designation (.4); call with C. Rognes re service (.2); research regarding note issues (1.4); correspondence with Sidley team re same (.5)	5.50
12/18/20	PP Reid	Emails with Sidley team regarding Holdco claim	.20
12/18/20	MA Clemente	Analysis of claims and strategy regarding CLOH notes and Select (1.9); respond to numerous emails with litigation team re: strategy and CLOH (.5); call with E. Bromagen re: CLOH and notes and claims (.3); address emails re: complaint confidentiality (.3); analysis of Trussway shares and various transfers (.6); prepare overall litigation strategy (.8); review discovery materials on Trussway and CLOH (.7)	5.10
12/18/20	M Abdul-Jabbar	Analysis of Trussway shares and various transfers (.8); confer with litigation team re: same (.2)	1.00
12/18/20	PG Foley	Review of time entries for privileged content (3.1); emails with D. Lutes regarding same (.1)	3.20
12/19/20	MA Clemente	Assess potential claims regarding CLOH notes and related issues (1.1); emails with E. Bromagen re: CLOH claims (.3)	1.40
12/21/20	CM Rognes	Review appendix and exhibits re: motion for preliminary injunction (0.3); revise motion citations re: appendix (0.2); attend weekly professionals call with Sidley and FTI (0.9)	1.40
12/21/20	J Hoffman	Confer with P. Montgomery, C. Rognes re: filing procedures for adversary complaint (0.2); draft correspondence to court clerk re: same (0.2)	.40

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Date	Name	Narrative	Hours
12/21/20	PH Montgomery	Call (in part) with FTI and Sidley teams regarding various issues (.2); communications with team regarding privilege issues (.2); communications with C. Rognes regarding filing under seal (.4); communications with J. Morris regarding confidentiality issues (.2)	1.00
12/21/20	MA Clemente	Call with M. Kirschner re: litigation (.4); formulate strategy regarding assessment of claims and overall integration of Kirschner (.6)	1.00
12/21/20	C Clark	Prepare additions to Appendix (1.0); assemble and relabel exhibits in support of Sealed Motion for Preliminary Injunction (.8)	1.80
12/21/20	A Russell	Correspond with M. Kirschner re CLOH complaint.	.30
12/21/20	PG Foley	Attend UCC professionals call (in part) regarding various case issues	.50
12/22/20	J Hoffman	Correspondence with P. Montgomery, C. Rognes re: complaint and PI motion strategy	.20
12/22/20	PH Montgomery	Call with M. Kirschner, M. Clemente and C. Rognes regarding litigation trust issues (.7); call with M. Clemente regarding committee update (.4); communications with J. Morris regarding confidential information (.1); correspond with C. Rognes and M. Abdul-Jabbar re sealing issues (.4); review of materials for discussion with M. Kirschner (5.7)	7.30
12/22/20	CM Rognes	Review appendix re: motion for preliminary injunction (0.5); review motion for preliminary injunction (0.5); correspond with P. Montgomery re: appendix (0.1); confer with litigation trustee, M. Clemente, and P. Montgomery re: investigation (0.7)	1.80
12/22/20	MA Clemente	Call with P. Montgomery and M. Kirschner re: issues (.7); call with P. Montgomery re: various litigation issues (.4); assess issues around CLOH note with select (.8)	1.90
12/22/20	C Clark	Assemble updated Appendix and combine same with exhibits per same	.50
12/22/20	A Russell	Correspond with M. Clemente and E. Bromagen re docket for J. Dondero adversary and transcripts from adversary hearing (.3); review, analyze transcript from Dondero TRO hearing (.5).	.80
12/22/20	EA Bromagen	Review transcripts of prior hearings regarding TRO (.5); emails with J. Hoffman and Z. Annabelle regarding same (.1)	.60
12/23/20	CM Rognes	Correspond with P. Montgomery re: filing complaint without seal (0.2); review adversary complaint re: CLO Holdco (0.2); correspond with J. Hoffman re: confidentiality issues and	1.30

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Date	Name	Narrative	Hours
		sealing (0.1); correspond with P. Montgomery re: confidentiality issues and sealing (0.2); review protective order (0.1); revise subpoena (0.5)	
12/23/20	J Hoffman	Call with C. Rognes re: adversary complaint filings (0.1); analyze terms of protective order for requirements for sealing (0.3); confer with C. Rognes, P. Montgomery re: adversary pleadings (0.4); research local and federal civil rules in connection with sealing requirements (0.3)	1.10
12/23/20	A Russell	Review, analyze withdrawal of Dondero motion to modify TRO.	.10
12/23/20	MA Clemente	Review letter and document requests from Debtor re: TRO and related issues (.5); analysis of CLOH litigation strategy (.8); address emails re: CLOH complaint (.3)	1.60
12/23/20	PH Montgomery	Call with J. Morris regarding complaint and PI motion (.4); call with C. Rognes regarding filing and related issues (.3); review of documents related to estate claims (4.7)	5.40
12/24/20	EA Bromagen	Review of deposition notices and related documents	.20
12/24/20	A Russell	Review, analyze notices of deposition for J. Dondero and A. Clubock re Dondero adversary (.3); correspond with Sidley team re same, discovery requests (.3); review, analyze correspondence and discovery requests for J. Dondero and UBS re Dondero adversary (.4).	1.00
12/24/20	MA Clemente	Analysis of CLOH notes and related transactions	.90
12/28/20	A Russell	Review, analyze J. Dondero motion for protective order and expedited hearing (.6); review update from Court and correspond with Sidley team re same (.3).	.90
12/28/20	M Abdul-Jabbar	Participate (in part) in strategy planning discussion with FTI and Sidley teams relating to pending negotiations with Seery, and discuss litigation updates	.50
12/28/20	MA Clemente	Address court correspondence re: hearings (.1); analysis of filings in connection with TRO and discovery (.6)	.70
12/28/20	MA Clemente	Evaluate issues around MultiStrat fund	.90
12/28/20	PH Montgomery	Call with FTI regarding outstanding tasks (.6); review of documents related to possible claims (2.2)	2.80
12/28/20	PG Foley	Attend UCC professionals call with Sidley and FTI teams regarding various case issues (.6); review related correspondence from FTI regarding same (.1)	.70
12/29/20	J Hoffman	Correspondence with P. Montgomery re: filing AP complaint and PI Motion (0.3); research local, federal rules re: service requirements (0.4)	.70

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Date	Name	Narrative	Hours
12/29/20	MA Clemente	Prepare for overall litigation strategy including CLOH	.90
12/29/20	PH Montgomery	Communications with J. Hoffman regarding answer and motion practice issues (.3); review of information related to potential claims (1.5)	1.80
12/30/20	PP Reid	Emails regarding potential claims by claims trustee	.40
12/30/20	MA Clemente	Respond to Kirschner emails re: information	.20
12/30/20	PH Montgomery	Communications with C. Rognes and M. Abdul-Jabbar regarding information requests from M. Kirschner	.40
12/30/20	J Hoffman	Finalize and file adversary complaint (0.2); confer with C. Rognes re: procedure for filing amended complaint (0.1); finalize and file PI motion (0.3)	.60
12/31/20	M Abdul-Jabbar	Confer with Meta-e and M. Kirschner regarding Select documents relating to CLO Holdco matter	.80
12/31/20	MA Clemente	Email with P. Reid and P. Montgomery re; litigation trust	.30
12/31/20	PH Montgomery	Communications with J. Hoffman and M. Abdul-Jabar regarding motion for injunction (.2); review of documents related to potential claims (9.5); communications with J. Morris regarding same (.2)	9.90
Task Subtotal			465.50
15 Plan and Disclosure Statement			
12/01/20	A Russell	Correspond with Sidley team and M. Kirschner re litigation trust presentation to Committee on 12/2 (.4); correspond with FTI re questions re P. Daugherty voting claim (.2).	.60
12/02/20	DM Twomey	Analyze potential recovery cap issues	.20
12/02/20	DM Twomey	Emails with team re potential recovery caps, related issues/research	.10
12/02/20	DM Twomey	Emails with Sidley team re trustee questions	.20
12/02/20	A Russell	Review, analyze M. Kirschner litigation trust presentation for UCC.	.30
12/02/20	EA Bromagen	Call with E. Cheng regarding litigation trustee compensation (.5); emails with M. Clemente, A. Russell regarding same (.2); review materials on litigation trustee compensation (.2)	.90
12/03/20	MA Clemente	Respond to email from D. Pauker re: indemnity, fees and related issues	.30
12/03/20	MA Clemente	Review solicitation package	.50
12/03/20	MA Clemente	Analysis of liquidity and funding for plan trust	1.00
12/03/20	DM Twomey	Emails with team re post-effective date trust/board issues	.20

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Date	Name	Narrative	Hours
12/03/20	A Russell	Correspond with M. Clemente and E. Bromagen re plan and trust-related issues and questions raised by D. Pauker and responses to same.	.70
12/03/20	EA Bromagen	Consider litigation trust compensation proposal and emails with E. Cheng regarding same	.40
12/04/20	MA Clemente	Emails with Sidley team re: further changes to plan, indemnity language and timing issues	.40
12/04/20	MA Clemente	Email with FTI re: compensation proposal	.10
12/04/20	MA Clemente	Call with M. Kirschner re: various issues	.40
12/04/20	MA Clemente	Call with D. Pauker re: various issues	.30
12/04/20	MA Clemente	Review Pauker questions	.20
12/04/20	MA Clemente	Prepare materials for M. Kirscher compensation	.50
12/04/20	MA Clemente	Assess litigation trustee issues	.90
12/04/20	A Russell	Telephone conference with E. Bromagen and G. Demo re open plan issues (.2); follow up correspondence with Sidley team re same (.2); correspond with G. Demo re same (.2); correspond with Sidley, FTI, and M. Kirschner re questions re insurance coverage for Litigation Trust (.3); correspond with M. Clemente and E. Bromagen re update re conversation with D. Pauker and responses to issues raised by same (.9)	1.80
12/04/20	DM Twomey	Emails with Sidley team re litigation trust issues (.20); analyze same issues (.30); correspond with M. Clemente re plan issues (.20); emails with Sidley team re plan supplement issues (.20); review portion of trust agreements (.30)	1.20
12/04/20	EA Bromagen	Call with A. Russell and G. Demo regarding various plan issues (.5); consideration of same and emails with Sidley team regarding same (.3); emails with A. Russell and M. Clemente regarding plan voting and claimant trust revisions (.5)	1.30
12/06/20	MA Clemente	Address email from A. Russell re: change to employee stipulation	.20
12/07/20	A Russell	Correspond with G. Demo re claimant trust agreement	.20
12/07/20	DM Twomey	Emails with PSZYJ, team regarding plan release provisions, related issues	.20
12/08/20	DM Twomey	Emails with FTI/Sidley teams regarding plan release and HarbourVest issues, related data (.30); emails with FTI/Sidley teams regarding claims/voting issues (.20); emails with FTI/Sidley teams regarding materials for UCC and review same (.30)	.80
12/08/20	A Russell	Review, comment on FTI's litigation trustee compensation	.80

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Date	Name	Narrative	Hours
		counter (.6); correspond with FTI re status of insider employee claim stipulations (.2).	
12/08/20	MA Clemente	Address insurance issues for trust including emails with insurance broker (.5); review revised compensation proposal for Kirschner (.3); email with FTI re: revised compensation proposal (.1); analysis of claims update from FTI (.4)	1.30
12/10/20	A Russell	Telephone conference and correspond with G. Demo and E. Bromagen re proposed resolution of open plan issues (.3); correspond with M. Kirschner re Committee's counterproposal on litigation trustee compensation, status of new Dondero litigation (.4).	.70
12/10/20	MA Clemente	Email with A. Russell re: comp proposal for M. Kirschner (.1); review open issues on litigation trust and creditor trust agreement including oversight of employee claims (.4)	.50
12/10/20	EA Bromagen	Discuss plan and other issues with G. Demo and A. Russell (.3); discuss various issues with A. Russell and M. Clemente (.4)	.70
12/15/20	MA Clemente	Analyze open issues for claimant trust (.3); review response on litigation trustee compensation (.2)	.50
12/15/20	A Russell	Revise claimant trust agreement (.9); correspond with Sidley team re same (.1).	1.00
12/16/20	MA Clemente	Review revisions to claimant trust agreement (.4); responsive email to A. Russell re: comments and revisions to claimant trust agreement (.2)	.60
12/16/20	A Russell	Review, analyze P. Montgomery comments to claimant trust agreement (.4); correspond with Sidley team re same (.3); review, revise litigation trust agreement (.2); correspond with Sidley, Pachulski, and Committee re revised drafts of trust agreements (.2).	1.10
12/17/20	MA Clemente	Review and respond to emails regarding changes to trust documents (.2); address Pauker compensation (.2)	.40
12/17/20	A Russell	Review, analyze comments to trust agreements (.4); revise same (.3); correspond with Sidley team re same (.2)	.90
12/17/20	DM Twomey	Emails with team regarding trust agreement revisions	.20
12/18/20	DM Twomey	Emails with PSZJ, Sidley team regarding employee claims/release proposal	.20
12/18/20	MA Clemente	Evaluate counterproposal from Debtor on open plan issues (.2); emails with E. Bromagen re: counterproposal (.2)	.40
12/18/20	EA Bromagen	Review and consideration of Debtor proposal for plan issues and email with Committee and Sidley team regarding same	.30

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Date	Name	Narrative	Hours
12/18/20	A Russell	Review, comment on senior employee stipulation for plan supplement filing (.6); correspond with G. Demo and E. Bromagen re same (.3); review, revise trust agreements (.4); correspond with Sidley team and G. Demo re same (.3).	1.60
12/21/20	MA Clemente	Assess remaining open issues on plan and paths to resolution (.4); analysis of potential votes and plan acceptance (.4); email with FTI re: claim analysis (.1)	.90
12/21/20	A Russell	Correspond with Sidley team re open plan/confirmation issues (.6); correspond with D. Pauker re comments to claimant trust agreement and analyze same (.4).	1.00
12/21/20	DM Twomey	Emails with team, D. Pauker regarding claimant trust agreement, related questions/issues (.20); review email update to UCC regarding same (.10)	.30
12/21/20	EA Bromagen	Review claimant trustee agreement (.6); emails with M. Clemente and A. Russell regarding Debtor proposal regarding same (.1)	.70
12/21/20	EA Bromagen	Address outstanding plan and claimant trust issues, and emails with M. Clemente and A. Russell regarding same	.50
12/22/20	A Russell	Correspond with E. Bromagen and M. Clemente re status of trustee, oversight board compensation proposals (.2); review, analyze Committee responses re resolution of trust governance issues and correspond with Sidley team re same (.5).	.70
12/22/20	EA Bromagen	Emails with Sidley team and Committee members regarding claimant trust issues	.20
12/23/20	A Russell	Correspond with M. Clemente and E. Bromagen re correspondence from Frontier Bank re vote and plan.	.30
12/23/20	MA Clemente	Respond to team emails re: changes to plan	.30
12/24/20	A Russell	Correspond with M. Clemente and E. Bromagen re resolution of open plan points.	.30
12/24/20	MA Clemente	Email with A. Russell re: Kirschner comp (.1); review details of Kirschner comp (.3); assess plan liquidity (.4)	.80
12/28/20	A Russell	Correspond with Sidley team re claimant trust agreement.	.20
12/28/20	MA Clemente	Analysis of voting scenarios from FTI	.40
12/29/20	A Russell	Review, analyze update from FTI re status of plan votes.	.20
12/29/20	MA Clemente	Analysis of potential confirmation issues re: Dondero (1.2); analysis of exit liquidity and funding of trust (.7); analysis of FTI materials on trust assets and debtor interests (.8)	2.70
12/30/20	A Russell	Review, analyze asset profile summary for D. Pauker and correspond with Sidley team re same.	.40

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Date	Name	Narrative	Hours
12/30/20	MA Clemente	Address emails regarding D. Pauker information requests (.3); assess issues around senior employee stipulation (.3); review claim analysis and class vote issues (.4)	1.00
12/31/20	A Russell	Revise trust agreements (2.3); correspond with Sidley, Committee, and Pachulski re same (.3).	2.60
12/31/20	MA Clemente	Review revisions to claimant trust and other documents (.5); emails with A. Russell re: changes (.2); work through definitions regarding estate claims and reorganized debtor claims (.4)	1.10
Task Subtotal			39.70
19 Relief from Stay and Adequate Protection			
12/17/20	A Russell	Attend hearing on P. Daugherty motion for relief from automatic stay (1.1); review, analyze filed papers ahead of same (.8).	1.90
Task Subtotal			1.90
24 Creditor Communications			
12/03/20	MA Clemente	Call with J. Moldovan re: various issues	.30
12/09/20	MA Clemente	Call with J. Moldovan re: various issues	.10
12/15/20	MA Clemente	Call with J. Terry re: depositions and various issues (.4); email with E. Felton re: board meeting (.1); address agenda and items for committee meeting (.4)	.90
12/15/20	MA Clemente	Call with J. Terry re: various issues	.40
12/21/20	MA Clemente	Call with M. Hankin re: various issues	.30
12/22/20	MA Clemente	Call with J. Terry re; various issues	.30
12/23/20	EA Bromagen	Discuss creditor communication with M. Clemente	.30
12/23/20	MA Clemente	Call with J. Terry re: various issues (.4); call with S. Ellison at Frontier Bank re: call from John Holt at Nextbank (.4)	.80
12/28/20	J Hoffman	Correspondence with Latham team re: hearing transcripts	.10
12/30/20	MA Clemente	Review several P. Daugherty emails	.40
Task Subtotal			3.90
Total Hours for all Tasks			642.70

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T A S K D E T A I L

Date	Name	Narrative	Hours
05 Committee Meetings			
01/06/21	MA Clemente	Participate in call with the committee	.50
01/06/21	A Russell	Attend Committee meeting call regarding recent developments and case issues	.50
01/06/21	DM Twomey	Conference call with UCC/advisors regarding recent developments, case issues	.50
01/06/21	CM Rognes	Attend weekly UCC call (in part) regarding recent developments and case issues	.30
01/06/21	PH Montgomery	Participate in call with UCC regarding recent developments and case issues	.50
01/06/21	PP Reid	Participate in UCC call regarding recent developments and case issues	.50
01/06/21	EA Bromagen	Weekly call with Committee regarding case issues	.50
01/11/21	MA Clemente	Assess correspondence to the committee from Mr. Dondero	.10
01/13/21	MA Clemente	Participate in Committee meeting regarding case issues	1.00
01/13/21	J Hoffman	Attend (in part) weekly Committee meeting regarding case issues	.80
01/13/21	A Russell	Attend weekly Committee meeting regarding case issues	1.00
01/13/21	DM Twomey	Weekly UCC/advisor call regarding case issues	1.00
01/13/21	CM Rognes	Attend UCC call regarding various case issues	1.00
01/13/21	PP Reid	Participate in creditor's meeting call regarding case issues	1.00
01/13/21	EA Bromagen	Weekly call with Committee re various issues	1.00
01/20/21	R Fink	Conference (in part) with Sidley/FTI teams and UCC regarding confirmation issues	.70
01/20/21	T Nifong	Attend UCC call (in part) regarding case issues	.70
01/20/21	J Hoffman	Attend Committee Board meeting (in part)	.70
01/20/21	MA Clemente	Participate in committee call regarding case issues	.80
01/20/21	A Russell	Attend and participate in weekly Committee meeting.	.80
01/20/21	PP Reid	Telephone conference with UCC regarding case issues	.80
01/20/21	PH Montgomery	Call with UCC regarding case issues	.80
01/20/21	CM Rognes	Attend UCC call (in part) regarding case issues	.50

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Date	Name	Narrative	Hours
01/20/21	T Nifong	Participate in Sidley/FTI team pre-UCC call regarding UCC meeting	.50
01/20/21	DM Twomey	Weekly conference call with UCC and professionals regarding case issues	.80
01/20/21	EA Bromagen	Weekly call with Committee re various issues	.80
01/22/21	CM Rognes	Attend UCC call regarding confirmation issues	.90
01/22/21	J Hoffman	Attend call with committee regarding confirmation issues	.90
01/22/21	MA Clemente	Call with UCC re: various issues (.9); review materials for same (.1)	1.00
01/22/21	A Russell	Attend Committee meeting re confirmation-related issues.	.90
01/22/21	PG Foley	Attend UCC meeting (in part) regarding confirmation issues	.70
01/22/21	DM Twomey	Conference call with UCC/advisors regarding case issues	.90
01/22/21	PP Reid	Participate in UCC call regarding confirmation issues	.90
01/22/21	PH Montgomery	Attend UCC meeting (in part) regarding confirmation issues	.20
01/26/21	CM Rognes	Attend UCC/advisors call (in part) regarding various case issues	.70
01/26/21	A Russell	Telephone conference with Sidley, FTI, and Committee re confirmation issues update.	.80
01/26/21	PG Foley	Attend UCC and FTI meeting (in part) regarding various case issues	.50
01/26/21	EA Bromagen	Call with Committee re various confirmation issues	.80
01/26/21	PH Montgomery	Attend UCC meeting with UCC and advisors regarding case issues	.80
01/26/21	PP Reid	Participate in UCC and advisors call regarding multiple case issues	.80
01/26/21	DM Twomey	Conference call with UCC/advisors regarding case issues, Dondero plan, other issues	.80
01/27/21	MA Clemente	Participate in committee meeting regarding updates, plan and case issues (1.3); emails with team regarding same (.1)	1.40
01/27/21	T Nifong	Participate in UCC call regarding case updates and issues (1.3); review materials for same (.1)	1.40
01/27/21	R Fink	Participate (in part) in weekly UCC meeting regarding plan confirmation, case updates and issues	1.20
01/27/21	A Russell	Attend and participate in standing Committee meeting regarding cas updates and issues	1.30

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Date	Name	Narrative	Hours
01/27/21	EA Bromagen	Weekly call with Committee re various issues (1.3); preparations for same (0.2)	1.50
01/27/21	DM Twomey	Conference call with UCC/advisors regarding case update and issues, Dondero plan	1.30
01/27/21	CM Rognes	Attend UCC call regarding case updates and issues	1.30
01/27/21	PH Montgomery	Participate in call with UCC regarding case updates and issues	1.30
01/27/21	PP Reid	Participate in UCC call regarding case updates and issues	1.30
Task Subtotal			41.70
06 Business Operations			
01/04/21	J Hoffman	Review agreed order for funds distribution	.10
01/04/21	MA Clemente	Call with J. Seery re: liquidity and various issues (.8); review plan liquidity (.3)	1.10
01/11/21	EA Bromagen	Review and consider Debtor retention plan proposal (.3); emails with FTI re same (.1)	.40
01/12/21	MA Clemente	Analysis of debtor deck regarding cash flows	.40
01/12/21	EA Bromagen	Review and analysis of retention plan proposal (.8); discussions re same with E. Cheng (.3); discuss various issues related to same with G. Demo (0.3)	1.40
01/13/21	MA Clemente	Call with J. Seery re: various issues (.4); analysis of revised materials from FTI on plan projections (.5)	.90
01/14/21	EA Bromagen	Emails with M. Clemente re redemption of Select fund interests	.20
01/19/21	MA Clemente	Address email from J. Pomerantz re: employee incentive plan (.1); email with FTI and team re: employee incentive plan (.1)	.20
01/21/21	EA Bromagen	Emails with C. Rognes re bonus plan documents and review of same	.30
01/23/21	MA Clemente	Call with J. Seery re: various issues	.50
01/29/21	A Russell	Review, analyze update re shared services issue and correspond with Sidley and FTI teams re same.	.40
Task Subtotal			5.90
07 Case Administration			
01/03/21	MA Clemente	Assess various upcoming court hearings and issues	.40
01/04/21	J Hoffman	Confer with clerk re: hearing schedule (0.1); correspondence with P. Montgomery re: hearing logistics for PI motion (0.1); confer with Sidley team re: Dondero deposition and hearing schedule (0.1)	.30

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Date	Name	Narrative	Hours
01/04/21	MA Clemente	Review agenda and prepare for call with FTI (.3); team call with FTI re: various issues (.9); address emails with Sidley team regarding meetings with the board (.2); calls with E. Bromagen re: meeting with the board (0.2)	1.60
01/04/21	DM Twomey	Weekly conference call with FTI/Sidley team regarding case issues, upcoming hearings and confirmation (.90); emails with team regarding potential trust hirings (0.2)	1.10
01/04/21	A Russell	Weekly telephone conference with Sidley and FTI team re current case issues.	.90
01/04/21	EA Bromagen	Weekly call with Sidley and FTI teams re various issues (.9); preparation for same (.1) call with D. Pauker, A. Russell, D. O'Brien, and E. Cheng re Debtor assets (.6); calls with G. Demo re scheduling (.1) calls with M. Clemente re scheduling and other issues (.2) scheduling of meetings and emails with Committee re various updates (.2)	2.10
01/05/21	J Hoffman	Review docket for Sidley CNOs for E. Bromagen (0.1); confer with P. Montgomery re: PI motion hearing (0.1); advise litigation team re: procedure for summons issuance (0.1)	.30
01/05/21	DM Twomey	Email with UCC regarding update and upcoming call	.10
01/05/21	A Russell	Correspond with Sidley and FTI teams re agenda for 1/6 Committee meeting.	.30
01/05/21	EA Bromagen	Draft agenda for weekly meeting and organize materials (.3); emails with Sidley and FTI teams, Committee re same (.2)	.50
01/06/21	MA Clemente	Call with FTI to prepare for board call (.5); call with D. Twomey re: strategy (.6); prepare for call with Committee (.7)	1.80
01/06/21	CM Rognes	Attend weekly pre-UCC call with Sidley and FTI teams	.50
01/06/21	DM Twomey	Conference call with FTI/Sidley regarding upcoming board call, UCC call preparation/issues, case issues (.50); phone conference with M. Clemente regarding strategy and board call (.60)	1.10
01/06/21	J Hoffman	Correspondence with Sidley, KCC teams re: fee application orders (0.2); correspondence with E. Bromagen re: service of AP pleadings (0.2); research notice requirements (0.1); correspondence with H. Young re: service of pleadings in adversary (0.1)	.60
01/06/21	A Russell	Telephone conference Sidley and FTI teams re preparation and coordination for Committee meeting (.5); correspondence with professionals regarding prep call (.2)	.70
01/06/21	EA Bromagen	Preparation for Committee call (.2); pre UCC call with FTI and Sidley teams regarding UCC call (.5); emails with Sidley team re call re plan issues (.1)	.80

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Date	Name	Narrative	Hours
01/07/21	J Hoffman	Correspondence with Sidley team re: adversary service procedure (0.2); update case calendar to reflect revised hearing dates (0.1)	.30
01/08/21	DJ Lutes	Review hearing materials, agendas and deadlines (.2); update electronic files for same (.1)	.30
01/08/21	J Hoffman	Correspondence with Sidley team re: adversary proceeding notices	.10
01/09/21	DM Twomey	Emails with M. Clemente, A. Russell, E. Bromagen regarding Dondero counsel communications, related questions (.20); analyze related settlement issues (.20); emails with FTI regarding claims update (.10)	.50
01/10/21	DM Twomey	Emails with team regarding employee comp issues (.20); emails with team regarding plan voting issues, related analysis (.20)	.40
01/11/21	DJ Lutes	Emails with Sidley team regarding status and deadlines (.1); review confirmation hearing materials and case developments for status (.2); research docket for entered order and updates (.1); prepare electronic files for same (.1)	.50
01/11/21	J Hoffman	Correspondence with Z. Annable, E. Bromagen re: 1/8 hearing transcript (0.1); review transcript of same (0.2)	.30
01/11/21	DM Twomey	Review agenda and prepare for call (.20); weekly conference call with FTI/Sidley teams regarding case issues, related tasks going forward (1.0)	1.20
01/11/21	MA Clemente	Team call with FTI re: various issues	1.00
01/11/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues (1.0); review materials for same (.1)	1.10
01/11/21	EA Bromagen	Weekly call with Sidley and FTI teams re various issues (1.0); review of docket, organization of pleadings and analyze various issues regarding same (0.7)	1.70
01/12/21	DJ Lutes	Review docket for CNOs, updated agendas and status	.10
01/12/21	MA Clemente	Call with J. Pomerantz re: various issues (.2); call with D. Twomey re: strategy (.4)	.60
01/12/21	J Hoffman	Correspondence with E. Bromagen, Debtor counsel re: Dondero depositions (0.1); review upcoming hearing schedule (0.1)	.20
01/12/21	DM Twomey	Phone conference with M. Clemente regarding update, confirmation and examiner issues (.40); review draft UCC presentation materials (.30); emails with FTI/Sidley teams regarding same, agenda (.20)	.90

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Date	Name	Narrative	Hours
01/12/21	EA Bromagen	Assess various case issues (.3); correspond with M. Clemente regarding same (.2); draft agenda for committee meeting, revision of same and emails with Sidley and FTI teams re same (.9)	1.40
01/13/21	MA Clemente	Call with FTI and Sidley teams to prepare for committee meeting (.5); call with E. Bromagen re: various issues (.3); prepare for committee meeting (1.0)	1.80
01/13/21	CM Rognes	Attend (in part) pre-UCC call with Sidley and FTI teams	.40
01/13/21	J Hoffman	Review committee letters with counterparties in connection with potential motion	.20
01/13/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee call.	.50
01/13/21	DM Twomey	Emails with Sidley/FTI teams regarding employee settlement, materials for UCC (.30); conference call with FTI/Sidley regarding preparation for UCC call (.50); review updated presentation materials (0.2)	1.00
01/13/21	EA Bromagen	Pre Committee call with FTI and Sidley (.5); discuss various issues with G. Demo (.3); emails with M. Clemente re various issues (.1); emails with M. Clemente and S. McLaughlin re court schedule (.1) emails with P. Daugherty re transcripts of hearings (.1)	1.10
01/14/21	J Hoffman	Review, revise FTI declaration (0.4); finalize and file declaration (0.1); analyze requirements for 4th interim fee app (0.1); correspondence with FTI team re: revisions to orders (0.1)	.70
01/14/21	DM Twomey	Review letter regarding emergency hearing request (.10); emails with team regarding same and related analysis (.30)	.40
01/15/21	DJ Lutes	Assess updates of plan developments, strategies and related timelines with Sidley team	.20
01/15/21	J Hoffman	Revise case timeline (0.2); finalize and file CNOs (0.2)	.40
01/16/21	EA Bromagen	Prepare schedule of hearings and depositions including email of same to Sidley team	.20
01/18/21	J Hoffman	Review, revise case timeline and debtor correspondence in connection with depositions	.20
01/18/21	MA Clemente	Call with J. Seery re: various issues	.40
01/19/21	MA Clemente	Team call with FTI re: various issues (.6); call with J. Seery re: various issues (.5); address agenda for committee call (.2)	1.30
01/19/21	MA Clemente	Call with J. Seery re: various issues (.5); call with D. Twomey re: strategy (.4)	.90

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Date	Name	Narrative	Hours
01/19/21	A Russell	Telephone conference and correspond with Sidley and FTI teams re current case issues.	.60
01/19/21	DM Twomey	Review agenda for FTI/Sidley call (.20); weekly conference call with FTI/Sidley regarding case issues, upcoming events (.60)	.80
01/19/21	EA Bromagen	Weekly call with Sidley and FTI teams re various issues	.60
01/19/21	EA Bromagen	Emails with Sidley and FTI team re agenda for Committee meeting, and email same to Committee	.20
01/20/21	CM Rognes	Attend pre-UCC call with FTI and Sidley for UCC meeting	.50
01/20/21	J Hoffman	Review Debtor correspondence with court (0.1); review expedited motion and update case calendar (0.1)	.20
01/20/21	MA Clemente	Call with with FTI and Sidley teams in preparation for Committee call	.50
01/20/21	A Russell	Telephone conference with Sidley and FTI teams re preparation and coordination for Committee meeting.	.50
01/20/21	DM Twomey	Pre-call with FTI/Sidley teams regarding preparation for UCC call	.50
01/20/21	EA Bromagen	Call with Sidley and FTI teams ahead of Committee call	.50
01/22/21	DJ Lutes	Review case updates and correspondence from Sidley team (.1); prepare electronic files for same (.1)	.20
01/22/21	MA Clemente	Prepare for committee meeting (.9); call with FTI to prepare for committee meeting (.5)	1.40
01/22/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting (.5); telephone conference with Sidley and FTI teams re follow up from same (.5)	1.00
01/22/21	DM Twomey	Correspond with M. Clemente regarding UCC/advisors call, next steps (.30); conference call with FTI/Sidley team regarding confirmation issues, Dondero plan issues, related tasks (0.5)	.80
01/25/21	MA Clemente	Participate in professional team call with FTI re: various issues (.8); emails with J. Pomerantz re: meeting with the board (.1)	.90
01/25/21	J Hoffman	Review case pleadings to update case calendar	.20
01/25/21	A Russell	Telephone conference and correspond with Sidley and FTI teams re current case issues.	1.00
01/25/21	EA Bromagen	Call with Sidley and FTI re various issues	.80
01/25/21	DM Twomey	Weekly conference call with FTI, Sidley team regarding case issues, updates, tasks going forward	.80

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Date	Name	Narrative	Hours
01/26/21	DJ Lutes	Review docket for updates (.1); prepare electronic materials for Sidley team (.2)	.30
01/26/21	J Hoffman	Complete transcript request from hearing (0.1); research re: retention updates for FTI (0.2); confer with FTI, Sidley teams re: disclosures (0.1)	.40
01/27/21	MA Clemente	Call with FTI team to prepare for committee call (.5); prepare for committee call (1.1)	1.60
01/27/21	DJ Lutes	Update electronic files for Sidley team (.2); review emails from Sidley team regarding confirmation developments for deadlines, calendaring and timing (.2)	.40
01/27/21	T Nifong	Participate (in part) in Sidley/FTI pre-UCC call regarding case issues and updates	.40
01/27/21	DM Twomey	Review plan comparison materials (.20); attend pre-call with FTI/Sidley regarding case issues, strategy going forward (.50)	.70
01/27/21	CM Rognes	Attend UCC pre-call with Sidley and FTI regarding case issues	.50
01/27/21	J Hoffman	Correspondence with Sidley, FTI teams re: connections checks	.30
01/27/21	A Russell	Telephone conference with Sidley and FTI teams (in part) to prepare and coordinate for Committee meeting.	.40
01/27/21	EA Bromagen	Weekly call with Sidley and FTI team re various issues	.50
01/28/21	MA Clemente	Call with J. Pomerantz re: various issues (.2); call with E. Bromagen re: various issues (.3)	.50
01/29/21	J Hoffman	Review transcript from hearing (.1); complete transcript information for court (.1)	.20
Task Subtotal			51.60
08 Claims Administration and Objections			
01/04/21	MA Clemente	Review HV settlement papers	.40
01/04/21	DM Twomey	Correspond with M. Clemente regarding Harbourvest claim/settlement (.20); review/analyze materials regarding Harbourvest claim/settlement (.80)	1.00
01/05/21	DM Twomey	Review/analyze pleadings, other materials regarding Harbourvest claims/settlement	2.50
01/06/21	A Russell	Review, analyze objections to Harbourvest claim settlement.	.60
01/06/21	DM Twomey	Review materials regarding and analyze Harbourvest claims/settlement	1.40
01/11/21	A Russell	Review, analyze update re UBS claim settlement (.2); review, analyze updates and opposing counsel correspondence re employee claims and settlement proposal (.6).	.80

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Date	Name	Narrative	Hours
01/14/21	MA Clemente	Review HV claims and related material	.40
01/14/21	A Russell	Attend hearing re settlement of Harbourvest claims (4.7); review, analyze pleadings re same (.2).	4.90
01/22/21	A Russell	Correspond with Sidley team re analysis of merits of certain bonus claims (.2); review analysis re same (.4); review, analyze executed stipulations re certain additional claims (.2); correspond with Pachulski re same (.1).	.90
01/24/21	EA Bromagen	Review filed advisor administrative expense claim, and underlying documents (1.1); emails with Sidley team re same (.2)	1.30
01/25/21	A Russell	Review, analyze analysis and correspondence re Dondero administrative claim filing.	.60
01/26/21	EA Bromagen	Review of payroll agreements underlying administrative claims filed by NexPoint	.50
Task Subtotal			15.30
09 Corporate Governance and Board Matters			
01/06/21	MA Clemente	Call with committee and the board (1.5); prepare for call with board (0.4)	1.90
01/06/21	PG Foley	Attend Board/UCC call (in part) regarding status updates and case issues	.80
01/06/21	A Russell	Attend weekly Board/UCC meeting regarding status updates and case issues	1.50
01/06/21	DM Twomey	Conference call with Debtor board, UCC, advisors regarding status update, case issues	1.50
01/06/21	PH Montgomery	Attend board call with UCC regarding status updates and case issues	1.50
01/06/21	PP Reid	Participate in Board with UCC regarding status updates and case issues	1.50
01/06/21	EA Bromagen	Call with Board and Committee re various issues	1.50
01/12/21	DM Twomey	Weekly Board/UCC and advisor call for status updates and case issues including review of materials for same	1.30
01/12/21	MA Clemente	Meeting with the Board and Committee for case issues	1.30
01/12/21	A Russell	Attend weekly Committee/Board call for status updates and case issues	1.30
01/12/21	PP Reid	Participate in Board and Committee call for case issues and updates	1.30
01/12/21	PH Montgomery	Participate in call with Board and Committee regarding case	1.30

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Date	Name	Narrative	Hours
		issues	
01/12/21	EA Bromagen	Call with Board and UCC regarding various case issues	1.30
01/21/21	R Fink	Conference with professionals, UCC and Independent Board regarding confirmation and amendments to plan of reorganization	1.10
01/21/21	MA Clemente	Call (in part) with the Committee and the Board re: current situation	.80
01/21/21	A Russell	Attend telephone conference with Committee and Independent Board, and professionals for same, re confirmation and D&O insurance issues (1.1); review materials for same (.1)	1.20
01/21/21	DM Twomey	Conference call with Debtor directors/advisors, UCC/advisors regarding plan confirmation/implementation issues	1.10
01/21/21	EA Bromagen	Call with Debtor and Committee re plan issues	1.10
01/25/21	MA Clemente	Call with the Committee and the board (.6); prepare for same (.2)	.80
01/25/21	A Russell	Telephone conference with Committee, Board, and professionals re confirmation issues	.60
01/25/21	PG Foley	Attend Board/Committee conference (in part) regarding confirmation issues	.30
01/25/21	PP Reid	Telephone conference with UCC and Board regarding confirmation issues	.60
01/25/21	PH Montgomery	Call with Board and UCC regarding updates	.60
01/25/21	DM Twomey	Conference call (in part) with directors/UCC and an advisors regarding confirmation and other issues	.30
01/25/21	EA Bromagen	Call with Board and UCC re confirmation issues	.60
Task Subtotal			27.10
10 Employee Benefits and Pensions			
01/21/21	PS Casey	Telephone conference with M. Clemente regarding employee issues and requirements	.20
01/22/21	PS Casey	Review bonus agreements	.80
01/22/21	PS Casey	Research Texas wage payment law	.50
01/22/21	PS Casey	Prepare analysis of bonus issue for M. Clemente	.60
01/25/21	A Russell	Correspond with Sidley and FTI teams re open questions re KERP motion.	.30
Task Subtotal			2.40

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Date	Name	Narrative	Hours
11 Retention			
01/14/21	PH Montgomery	Review and revise engagement letter (.7); correspond with M. Clemente and P. Reid regarding pricing for new engagement (.3)	1.00
01/26/21	DJ Lutes	Emails with J. Hoffman regarding parties of interest for additional professional retention (.1); research materials for same (.4)	.50
01/27/21	DJ Lutes	Emails with J. Hoffman regarding parties of interest lists requested by professionals (.2); research materials for same (.6); analyze related issues for J. Hoffman (.3)	1.10
Task Subtotal			2.60
12 Fee Applications			
01/04/21	DJ Lutes	Prepare interim fee application materials and exhibits	2.10
01/04/21	J Hoffman	Correspondence with FTI team re: interim fee application filing (0.1); review, revise interim fee application (0.3); finalize and file fee application (0.2); correspondence with KCC team re: service of pleadings (0.1)	.70
01/05/21	DJ Lutes	Prepare interim fee application materials and exhibits (2.3); prepare monthly fee application materials (.3)	2.60
01/05/21	J Hoffman	Revise orders on interim fee apps (0.3); finalize and file orders for fee apps (0.3)	.60
01/06/21	DJ Lutes	Prepare monthly fee application materials for compliance (.3); prepare 4th interim fee application and exhibits (6.1)	6.40
01/07/21	DJ Lutes	Prepare monthly fee application materials for compliance	.30
01/08/21	DJ Lutes	Prepare monthly fee application materials and exhibits	.30
01/11/21	DJ Lutes	Prepare monthly fee application materials and exhibits (.9); emails to S. Caputo regarding same (.2); prepare interim fee application (.8)	1.90
01/12/21	DJ Lutes	Prepare monthly fee application materials and exhibits for compliance (3.1); prepare interim fee application (.6); reconcile charts for same (.4); emails with S. Caputo regarding same (.2)	4.30
01/13/21	DJ Lutes	Prepare monthly fee application materials and exhibits for compliance (6.2); prepare interim fee application (1.8); prepare email summary for M. Clemente (.2)	8.20
01/13/21	J Hoffman	Review docket for fee app objections (0.1); draft fee app CNOs (0.3)	.40
01/14/21	DJ Lutes	Prepare interim fee application including revisions to exhibits (1.5); prepare monthly fee application materials and exhibits (2.7); correspond with M. Clemente regarding same (.2); email	4.90

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Date	Name	Narrative	Hours
		to P. Foley regarding monthly fee application privilege review (.1); correspond to E. Bromagen and J. Hoffman regarding interim fee application (.1); prepare electronic materials for same (.3)	
01/15/21	DJ Lutes	Prepare monthly fee application materials and exhibits (.8); emails to S. Caputo regarding same (.2)	1.00
01/18/21	J Hoffman	Review interim fee application (0.2); draft interim fee application (0.3)	.50
01/19/21	DJ Lutes	Prepare monthly fee application	1.90
01/19/21	J Hoffman	Draft interim fee application	1.00
01/20/21	DJ Lutes	Prepare monthly fee application (.3); email to P. Foley regarding same (.1); review 4th interim fee application (.4); emails with J. Hoffman regarding same (.1)	.90
01/20/21	J Hoffman	Revise fee application (0.9); correspondence with D. Lutes re: interim and monthly fee application updates (0.1)	1.00
01/21/21	DJ Lutes	Prepare monthly fee application materials (3.4); emails with M. Clemente and J. Hoffman regarding same (.2); prepare interim fee application (.3)	3.90
01/21/21	MA Clemente	Review December fee application	.40
01/22/21	DJ Lutes	Prepare monthly fee application materials (.4); emails with M. Clemente and J. Hoffman regarding same (.2); prepare interim fee application (.3); email to E. Bromagen regarding same (.2)	1.10
01/22/21	J Hoffman	Confer with D. Lutes re: fee applications (0.1); review, finalize fee application for internal review (0.3)	.40
01/23/21	DJ Lutes	Review monthly and interim fee application pending tasks and next steps including correspondence with Sidley team regarding same	.30
01/23/21	J Hoffman	Email committee re: fee application	.10
01/25/21	DJ Lutes	Prepare interim fee application including review of case status and pending matters for filing issues	.20
01/26/21	DJ Lutes	Prepare interim fee application materials (.2); email to Sidley team regarding same (.1); email with S. Caputo regarding December invoice (.1)	.40
01/26/21	J Hoffman	Finalize and file 14th monthly fee application	.20
01/27/21	DJ Lutes	Emails with S. Caputo regarding monthly fee application materials (.1); prepare electronic files for same (.2); emails with J. Hoffman regarding interim fee application status (.1); review interim fee application filing materials (.2)	.60
01/27/21	J Hoffman	Finalize and file fourth interim fee application	.40

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Date	Name	Narrative	Hours
01/27/21	EA Bromagen	Review 4th interim fee application for filing	.60
01/28/21	DJ Lutes	Emails with J. Hoffman regarding 4th interim (.1); prepare electronic materials for Sidley team regarding same (.2)	.30
01/29/21	DJ Lutes	Emails with K. Rust (UST) regarding electronic data materials (.1); prepare materials for same (.3)	.40
Task Subtotal			48.30
14 Litigation			
01/03/21	CM Rognes	Review recent document production	.20
01/03/21	PH Montgomery	Communications with J. Morris and A. Russell regarding litigation trust agreement issues	.40
01/04/21	CM Rognes	Attend weekly professionals call with Sidley and FTI regarding case issues (0.9); correspond with FTI re: accounting requests (0.2)	1.10
01/04/21	MA Clemente	Analysis of CLOH notes with Select (.8); assess overall strategy regarding litigation (.5)	1.30
01/04/21	M Abdul-Jabbar	Participate in UCC professionals call regarding collection and accounting follow-up	.90
01/04/21	PH Montgomery	Weekly call with FTI and Sidley teams regarding case issues (.9); communications with J. Morris regarding documents and litigation trust agreement (.3); review and revise information request for DSI (.4); review of documents related to financial records of affiliates (3.2)	4.80
01/04/21	PG Foley	Correspondence with litigation team regarding general ledger follow-up	.30
01/04/21	PG Foley	Attend UCC professionals call (in part) with FTI and Sidley teams regarding case issues	.50
01/04/21	A Russell	Correspond with Sidley and Pachulski re logistics for Dondero deposition.	.20
01/05/21	PP Reid	Participate in deposition of Dondero (4.5); review spreadsheets on Holdco transfers (.3); telephone conference with M. Clemente and P. Montgomery regarding Dondero deposition and objections to the plan (.4)	5.20
01/05/21	CM Rognes	Document review (0.5); draft preservation notice (2.5); correspond with P. Montgomery re: preservation notice (0.2); draft third party subpoena (1.0); research re: subpoena (0.7); correspond with P. Montgomery re: subpoena (0.1); research re: adversary proceeding service (0.6)	5.60
01/05/21	MA Clemente	Attend Dondero deposition (4.5); call with P. Reid and P. Montgomery re: strategy (.4); review materials for same (.1)	5.00

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Date	Name	Narrative	Hours
01/05/21	J Hoffman	Confer with C. Rognes re: service of summons (0.1); research re: same (0.4)	.50
01/05/21	PH Montgomery	Participate in Dondero deposition (4.5); review and revise subpoena and preservation notice regarding adversary proceeding (.5); correspond with P. Reid regarding research of claims (.1); call with J. Morris regarding discovery issues (.1); call with M. Clemente and P. Reid regarding claims issues (.4); communications with M. Abdul-Jabbar regarding legal research (.2); communications with E. Bromagen regarding claim research (.2); review of documents related to potential claims (3.2); communications with J. Morris regarding document requests (0.2)	9.40
01/05/21	PG Foley	Correspondence with Sidley team regarding Dondero and strategy (.4); review of documents for same (.9)	1.30
01/05/21	A Russell	Attend deposition of J. Dondero (4.5); correspond with Sidley team re follow up from same, notice re adjournment of A. Clubock deposition (.3); review, analyze data preservation letters and correspond with Sidley team re same (.2).	5.00
01/05/21	DM Twomey	Emails with team regarding Dondero deposition updates	.20
01/06/21	CM Rognes	Research re: service of adversary complaint (2.3); correspond with P. Montgomery and Debtor's counsel re: outstanding discovery requests (0.4); review order re: amended cover sheet (0.2); revise cover sheet (0.1); correspond with J. Hoffman re: amended cover sheet (0.1); correspond with J. Hoffman re: service of adversary complaint (0.2); correspond with P. Montgomery re: amended cover sheet (0.1); review protective order (0.1)	3.50
01/06/21	PP Reid	Review FTI's analysis of Holdco transfers and additional information requests (.5); participate in telephone conference with FTI for UCC meeting (.5)	1.00
01/06/21	NP Cade	Correspond with C. Rognes regarding service research (.1); research Cayman entities registered agent information (.5); communication with First Legal regarding process for serving Cayman entities (.2)	.80
01/06/21	C Clark	Review materials in connection with Debtor's Exhibit and Witness list (.7); prepare downloads for C. Rognes for review (.6); update attorney information of efilng notifications (0.3)	1.60
01/06/21	J Hoffman	Review, analyze AP pleadings (0.2); research timing matters for service of summons (0.2); correspondence with C. Rognes re: amended complaint and summons (0.2)	.60
01/06/21	PG Foley	Attend UCC professionals call regarding preparation for UCC call (.5); related correspondence with professionals regarding	.70

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Date	Name	Narrative	Hours
		same (.2)	
01/06/21	A Russell	Review, analyze adversary complaint for TRO against CLO funds and advisors (.6); correspond with Sidley team re same (.2).	.80
01/06/21	PH Montgomery	Participate in weekly call with FTI and Sidley teams for UCC call (.5); call with C. Rognes and J. Morris re discovery issues (.5); review and revise retention letter (1.1); review of documents and data related to potential claims (4.2)	6.30
01/06/21	EA Bromagen	Review transcript of Dondero deposition	.60
01/07/21	DJ Lutes	Review incoming Debtor materials, complaint and hearing adjournment timing (.2); update calendar and deadlines (.1)	.30
01/07/21	CM Rognes	Team call with D. Twomey, M. Clemente, A. Russell, E. Bromagen, P. Reid and P. Montgomery re: plan voting, objections, and litigation (1.1); correspond with P. Montgomery and P. Reid preservation letters and indemnification (0.2); review indemnification obligations of Debtor (0.5); correspond with P. Montgomery re: preservation letters (0.3); draft preservation letters (1.1); review Debtor complaint (0.2); document review (0.7); correspond with P. Montgomery and committee member re: investigation (1.4); review deposition transcript re: Dondero deposition (0.2); review recently filed adversary proceedings (0.3)	6.00
01/07/21	M Abdul-Jabbar	Review case law relating to wire fraud	1.00
01/07/21	PP Reid	Review and revise document preservation letters (.3); participate in strategy call with Sidley team regarding confirmation and objection papers (1.1); emails with Sidley team regarding Debtor's advocacy petitions (.2)	1.60
01/07/21	NP Cade	Prepare downloads of electronic deposition transcripts and exhibits from Court Reporter's (TSG Reporting) repository (.8); organize electronic folder of same for attorney review (0.5)	1.30
01/07/21	A Russell	Review, analyze Debtor's motion to find Dondero in contempt for violation of TRO and briefing in support of same.	1.10
01/07/21	PH Montgomery	Call with debtor counsel regarding confirmation issues (.5); call with J. Terry regarding fact issues (1.4); call with Sidley team regarding confirmation and objection papers (1.1); review of data related to claims (2.3)	5.30
01/07/21	EA Bromagen	Gather and review adversary filings (.7); email schedule to Committee re same (.2)	.90
01/08/21	M Abdul-Jabbar	Research potential claims (2.7); summarize case law and prepare annotations for P. Reid and P. Montgomery relating to litigation strategy (1.8)	4.50

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Date	Name	Narrative	Hours
01/08/21	PP Reid	Participate in hearing (in part) on Dondero's preliminary injunction (5.2); emails regarding with litigation team regarding next steps (0.3)	5.50
01/08/21	J Hoffman	Attend (in part) hearing on Dondero TRO matter	1.80
01/08/21	CM Rognes	Draft preservation notices (1.7); correspond with opposing counsel re: preservation notice (0.1); correspond with P. Montgomery re: preservation notices (0.2); correspond with third party objectors re: document review and production (0.4); research re: spoliation (0.1)	2.50
01/08/21	DM Twomey	Attend hearing (in part) regarding preliminary injunction against J. Dondero (5.20); post-call analysis with M. Clemente regarding same, next steps (.60); emails with FTI/Sidley teams regarding same (.20); emails with team regarding document preservation letters (.10); emails with FTI/Sidley teams regarding Dondero proposal next steps (.20); emails with M. Clemente, A. Russell, E. Bromagen regarding communications with Dondero counsel, proposed response (.30)	6.60
01/08/21	MA Clemente	Attend hearing on Dondero TRO matter (6.8); revisions to hold letter to Ellington and Leventon (.2); email to C. Rognes re: hold letter (.1)	7.10
01/08/21	A Russell	Attend hearing on Debtor's motion for preliminary injunction against J. Dondero (6.3); correspond with Sidley team re follow up from same (.4)	6.70
01/08/21	PH Montgomery	Attend hearing (in part) on Dondero TRO matter (4.5); review and revise preservation letter (.3); review of documents related to potential claims (4.1)	8.90
01/08/21	EA Bromagen	Attend hearing on injunction in Dondero adversary proceeding	6.10
01/09/21	CM Rognes	Revise preservation letter	.10
01/10/21	PP Reid	Emails regarding next steps for M. Kirschner (.2); emails regarding Dondero's Pot plan (.2)	.40
01/10/21	CM Rognes	Revise preservation letters (0.3); correspond with P. Montgomery re: preservation letters (0.1); research re: service (0.2)	.60
01/11/21	C Clark	Correspond with M. Abdul-Jabbar regarding case research (.2); prepare electronic downloaded cases cited and forward same to M. Abdul-Jabbar for review (.4)	.60
01/11/21	CM Rognes	Document review (0.4); attend weekly professionals call with Sidley and FTI regarding outstanding issues (1.0); draft preservation notices (0.6); correspond with opposing counsel re: preservation notices (0.1)	2.10
01/11/21	PP Reid	Participate in professionals call regarding various outstanding	2.30

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Date	Name	Narrative	Hours
		issues (1.0); review materials for Holdco claim (.6); telephone conference with Sidley team regarding note collection claims (.5); review and revise preservation letters (.2)	
01/11/21	M Abdul-Jabbar	Participate in professional strategy call with Sidley and FTI team analyzing outstanding issues (1.0); research state law concerning potential claims (1.1)	2.10
01/11/21	MA Clemente	Sidley team call re: litigation strategy (.5); work on resolving issues regarding Select note payment (0.9)	1.40
01/11/21	PH Montgomery	Call with M. Clemente and D. Twomey regarding note payments (.5); call with FTI regarding outstanding issues (1.0); review and revise retention notice letter (.6); review cases related to potential claims (1.1); communications with MAJ regarding causes of action (.3); review additional materials related to potential claims (4.2); correspond with M. Clemente regarding privilege issues (0.1)	7.80
01/11/21	PG Foley	Attend (in part) weekly professionals call with Sidley and FTI teams regarding outstanding issues	.60
01/11/21	DM Twomey	Emails with Sidley/FTI teams regarding settlement issues (.20); analyze same issues (.40); conference call with Sidley team regarding note repayment issues, potential strategy (.50); emails with Sidley team regarding privilege issues (.20); emails with FTI/Sidley teams regarding proposed employee settlement (.30); analyze same (.10)	1.70
01/12/21	CM Rognes	Draft matrix re: status of objector's document review and production (0.3); document review (0.2); review court order re: motion to compel (0.1); review ESI protocol (0.1)	.70
01/12/21	PP Reid	Emails with FTI regarding Dondero and Debtor plan comparison (.2); emails with M. Kirschner regarding claim issues (.2); emails with Sidley and FTI teams regarding CLOH claims (.2); emails Sidley team regarding Leventon/Ellington's legal bills (.1)	.70
01/12/21	MA Clemente	Analysis of examiner letter (.4); emails with A. Russell and E. Bromagen re: examiner letter (.3)	.70
01/12/21	M Abdul-Jabbar	Review correspondence relating to employee settlement discussions and indemnification claims (.3); review litigation trustee's potential claims and allegations (.6)	.90
01/12/21	J Hoffman	Confer with C. Rognes, P. Montgomery re: amended adversary complaint	.20
01/12/21	PH Montgomery	Communications with P. Reid, C. Rognes, and M. Clemente regarding budgeting for potential future engagement	.50
01/12/21	PH Montgomery	Review of materials related to employee claims (2.1); communications with M. Abdul-Jabbar regarding potential	6.30

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Date	Name	Narrative	Hours
		claims (.3); draft correspondence with M. Kirschner regarding claims issues and related communications (1.3); communications with objectors regarding review status (.5); review of materials related to contract claims (2.1)	
01/12/21	A Russell	Correspond with Sidley team and M. Kirschner re M. Kirschner litigation questions (.3); review, analyze Dugaboy letter re examiner (.4); correspond with Sidley team re same (.4).	1.10
01/12/21	DM Twomey	Review FTI email regarding update claims/recovery information (.20); analyze issues regarding potential employee settlements and review related information (.30); review letter regarding examiner appointment request (.10); analyze related issues (0.3)	.90
01/12/21	EA Bromagen	Review of letter re request for examiner and research regarding same (.4); emails with Sidley team regarding same (.2)	.60
01/13/21	PP Reid	Emails from Leventon/Ellington's counsel regarding document retention (.2); review comparison of Dondero and Debtor plans (.5); emails regarding same (.2); participate in call with FTI for UCC meeting (.5); emails with M. Kirschner regarding claims (.5); review materials for litigation claims (.6)	2.50
01/13/21	MA Clemente	Revisions to and finalize examiner letter (.5); respond to emails with A Russell and E. Bromagen re: examiner letter (.3); review debtor examiner letter (.1)	.90
01/13/21	M Abdul-Jabbar	Review files relating to Get Good and Dugaboy in connection with allegations against Dondero	.30
01/13/21	DM Twomey	Emails with Sidley team regarding examiner letter, response (.30); evaluate examiner, confirmation and other issues (.50); review draft response examiner letter (.10); emails with team regarding same (.20); emails regarding employee issues and related analysis (.30)	1.40
01/13/21	NP Cade	Prepare electronic downloads of Pugatch final deposition and exhibits (.4); organize same for attorney review (.3)	.70
01/13/21	CM Rognes	Attend data preservation call with FTI, DSI, Pachulski, and P. Montgomery (0.6); correspond with P. Montgomery re: amended civil cover sheet (0.1)	.70
01/13/21	C Clark	Assemble and electronically file Highland's amended civil cover sheet	.50
01/13/21	PH Montgomery	Call with FTI regarding UCC meeting (.5); call with DSI and FTI regarding data preservation issues (.6); correspond with P. Reid, M. Clemente regarding data retention (.2); review of materials related to potential claims (4.1)	5.40

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Date	Name	Narrative	Hours
01/13/21	A Russell	Correspond with Sidley and FTI teams re Dugaboy examiner letter and response re same (.6); review, analyze draft Committee response to examiner letter (.4); review analyze Debtor response to same (.3); review, analyze employee preservation letters and correspondence re same (.2).	1.50
01/13/21	PG Foley	Analyze J. Dondero deposition, materials (.3); attend UCC professionals call regarding UCC call (.5); attend UCC call (in part) regarding case issues (.7)	1.50
01/13/21	EA Bromagen	Discuss data preservation issues with E. Cheng (.2); draft letter response to Dugaboy letter proposing examiner (.8); further revisions to same (.4); emails with Sidley team re response to Dugaboy letter (.3)	1.70
01/14/21	MA Clemente	Participate in settlement hearing (4.7); call with M. Kirschner re: various issues (.4); address emails from Dugaboy re: examiner (.2)	5.30
01/14/21	T Nifong	Review onboarding materials regarding Highland Bankruptcy	5.30
01/14/21	PH Montgomery	Attend hearing regarding 9019 motion and settlement hearing (4.3); communications with C. Rognes regarding discovery issues (.4); review of materials related to potential claims (.9)	5.60
01/14/21	PP Reid	Participate in portion of court hearing on Harbourvest (.8); emails with Sidley team and FTI regarding debtor litigation (.2)	1.00
01/14/21	J Hoffman	Attend (in part) hearing on lift stay settlement	.30
01/14/21	M Abdul-Jabbar	Attend hearing (in part) in connection with the HarborVest settlement and pending liquidating plan	1.50
01/14/21	DM Twomey	Listen to portion of hearing regarding Harborvest settlement	2.80
01/14/21	EA Bromagen	Attend hearing on Harbourvest settlement	4.70
01/15/21	PH Montgomery	Call regarding litigation strategy with D. Twomey , M. Clemente P. Reid and C. Rognes (1.1); review of materials related to potential claims (2.2)	3.30
01/15/21	MA Clemente	Review motion to expedite examiner and examiner motion (.2); email to A. Russell and E. Bromagen re: response (.1); call with P. Reid, P. Montgomery and D. Twomey re; litigation strategy (1.1); detailed email of conversation with J. Pomerantz to litigation team (.2)	1.60
01/15/21	DM Twomey	Review examiner motion and related analysis (.30); emails with team regarding examiner motion, response (.20); review motion to expedite (.20); emails with team regarding same, potential response (.20); conference call with team regarding key open litigation issues, strategy and next steps (1.1); review select notes, demand letter (.30); analyze related issues (.20); emails with PSZYJ, M. Clemente regarding same (0.1)	2.60

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Date	Name	Narrative	Hours
01/15/21	CM Rognes	Review Dugaboy and Get Good proofs of claim (0.1); correspond with P. Montgomery, M. Clemente, and D. Twomey re: litigation strategy (1.1); draft summary of litigation strategy call (0.2); correspond with T. Nifong re: case background (0.5); correspond with P. Montgomery re: custodial list (0.1); review notes re: data preservation call (0.2)	2.20
01/15/21	PP Reid	Telephone conference (in part) with Sidley team regarding litigation matters going forward	.50
01/15/21	PP Reid	Emails regarding upcoming depositions for TRO and confirmations (.5); emails with M. Kirschner regarding claims (.5); review revised Dondero term sheet (.5); emails regarding same (.1); emails regarding CLO Holdco's demand letter (.1); emails and telephone conference regarding Debtor's response to CLO Holdco (.2)	1.90
01/15/21	A Russell	Review, analyze examiner motion and request for emergency hearing (.9); correspond with Sidley team re same, objection to emergency relief (.4); draft objection to emergency relief (.2); correspond with Pachulski re same (.1); review, analyze Court correspondence denying motion for emergency relief (.1); correspond with Sidley team re same (.1).	1.80
01/15/21	T Nifong	Correspond with C. Rognes re: researching case law on motion to compel preservation of documents, onboarding documents and case background	.50
01/15/21	EA Bromagen	Emails with Sidley team and Committee re examiner motion, motion to expedite, and review of same	.30
01/16/21	T Nifong	Correspond with C. Rognes regarding research on compelling preservation of documents	.10
01/16/21	CM Rognes	Review search terms	.60
01/17/21	CM Rognes	Review search terms (0.2); review, summarize outstanding discovery requests (0.5)	.70
01/18/21	T Nifong	Research case law re: compelling document preservation	2.30
01/18/21	CM Rognes	Draft outline re: motion to preserve (1.4); confer with Pachulski, P. Montgomery, M. Clemente, D. Twomey, and P. Reid re: litigation (0.8); correspond with T. Nifong re: preservation research (0.1); review search terms (0.3); draft agenda re: litigation call (0.2); review adversary complaint (0.1)	2.90
01/18/21	DM Twomey	Emails with team regarding agenda for call with PSZYJ (.10); conference call with PSZYJ, Sidley regarding litigation issues, preparation and strategy (.80); emails with PSZYJ, team regarding Select issue (.10)	1.00

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Date	Name	Narrative	Hours
01/18/21	PP Reid	Telephone conference with Debtors' counsel regarding notes receivable litigation, plan and discovery issues (.8); emails with Sidley team regarding same (.2)	1.00
01/18/21	PH Montgomery	Call with J. Morris regarding litigation issues	.70
01/18/21	MA Clemente	Call with Pachulski and Sidley team re: confirmation and related issues (.8); review agenda for call with Pachulski team (.1); prepare materials on Select note issues (1.0)	1.90
01/19/21	T Nifong	Research case law and draft email memo re: motion to compel preservation of documents	2.30
01/19/21	PP Reid	Telephone conference with FTI regarding plan and upcoming depositions (.6); emails with FTI and Sidley teams regarding depositions (.6); emails with Kirschner regarding claims (.5)	1.70
01/19/21	CM Rognes	Research re: motion to preserve (1.6); review local rules (0.2); draft motion to preserve (2.3); attend weekly professionals call with FTI and Sidley (0.6); review adversary complaint (0.2); review demand notes (0.2); correspond with P. Montgomery re: demand notes (0.2)	5.30
01/19/21	PH Montgomery	Call with FTI regarding outstanding tasks (.6); communications with C. Rognes regarding motion to compel (.3); review and revise draft agenda (.2); review of materials related to potential claims (5.2)	6.30
01/19/21	MA Clemente	Email with P. Montgomery and D. Twomey re: Select	.10
01/19/21	PG Foley	Weekly UCC professionals call with FTI and Sidley teams (.6); related correspondence with FTI and Sidley teams regarding same (.1)	.70
01/20/21	T Nifong	Create data charts for Demand Letters and Notes	1.10
01/20/21	T Nifong	Draft Argument re: Motion to Compel Production	1.30
01/20/21	PP Reid	Participate in Seery deposition (in part) (2.0); telephone conference with UCC professionals regarding UCC meeting (.5)	2.50
01/20/21	CM Rognes	Draft motion to preserve (0.8); correspond with T. Nifong re: motion to preserve (0.1)	.90
01/20/21	PH Montgomery	Attend deposition of J. Seery (4.4); call with FTI and Sidley teams regarding UCC meeting (.5); review draft complaint regarding note payments (.6); correspondence with C. Rognes and T. Nifong regarding same (.2); communications with J. Morris regarding depositions (.1)	5.80
01/20/21	MA Clemente	Attend Seery deposition	2.20
01/20/21	A Russell	Attend deposition of J. Seery re CLO adversary proceeding.	2.20

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Date	Name	Narrative	Hours
01/20/21	PG Foley	Attend UCC professionals call with Sidley and FTI teams for UCC call (.5); related correspondence with Sidley and FTI teams regarding same (0.1)	.60
01/21/21	T Nifong	Draft argument re: Motion to Compel Preservation	3.60
01/21/21	CM Rognes	Document review regarding litigation issue (0.2); correspond with T. Nifong re: motion to preserve (0.1); draft motion to preserve (1.5)	1.80
01/21/21	M Abdul-Jabbar	Review Dondero offer and proposal in connection with liquidation plan	.30
01/21/21	PP Reid	Participate in deposition of G. Scott (3.1); emails and telephone conferences with Sidley and FTI teams regarding Dondero's plan (.2); emails with Sidley team regarding potential D&O issues (.6)	3.90
01/21/21	PH Montgomery	Attend G. Scott deposition (2.7); prepare for litigation trust discussion (.5); review of materials related to claims (3.2)	6.40
01/21/21	A Russell	Attend deposition of G. Scott re CLO adversary.	3.80
01/21/21	PG Foley	Review of and revisions to monthly fee application regarding privilege and confidentiality	3.20
01/22/21	T Nifong	Draft motion to Compel Preservation of Evidence	2.50
01/22/21	M Abdul-Jabbar	Review certain select documents and related correspondence in connection with CLO Holdco matter (.4); correspond with C. Rognes re: same (0.1)	.50
01/22/21	CM Rognes	Confer with P. Montgomery, M. Clemente, FTI, and litigation trustee re: litigation status (0.7); correspond with litigation trustee re: litigation status (0.3); draft motion to preserve (2.4); draft agenda re: call with litigation trustee (0.1); document review regarding same(0.2); review chronology re: select documents (0.3); correspond with T. Nifong re: motion to preserve (0.2); correspond with FTI re: accounting documents (0.1)	4.30
01/22/21	PH Montgomery	Attend J. Post deposition (2.2); call with M. Kirschner regarding litigation trust issues (.6); call with J. Morris regarding deposition issues (.1); review and revise chronology (1.1)	4.00
01/22/21	PP Reid	Participate in J. Post's deposition (2.2); review revise Dondero plan (.3); emails with Sidley and FTI teams regarding same (.2); emails with Sidley team regarding confirmation scheduling and witness list (.2)	2.90
01/22/21	MA Clemente	Call with M. Kirschner and team regarding claims (.5); address P. Casey email re: employee issues (.3); address emails re: confirmation exhibits (.3)	1.10

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Date	Name	Narrative	Hours
01/22/21	A Russell	Review, analyze complaints filed re note defaults (.4); correspond with Sidley team re same (.1).	.50
01/24/21	PP Reid	Review Dondero new proposed plan (.5); emails with Dondero counsel regarding same (.2); emails with Sidley team regarding injunction hearing (.3)	1.00
01/25/21	PP Reid	Participate in professional call (in part) with FTI and Sidley teams regarding confirmation issues (.6); emails with Sidley team regarding certifying questions to 5th circuit (0.2)	.80
01/25/21	CM Rognes	Review documents re: tax information (0.3); review select documents (0.3); draft chronology re: select documents (1.5); attend weekly professional call with Sidley and FTI regarding case issues (0.8)	2.90
01/25/21	M Abdul-Jabbar	Confer with FTI professional team and Sidley bankruptcy and litigation teams regarding current case issues	.80
01/25/21	PG Foley	Weekly UCC professionals call with FTI and Sidley teams regarding various case issues	.70
01/25/21	EA Bromagen	Emails with P. Montgomery, P. Reid, and D Twomey re 5th circuit appeal process, review of related statute (.4); review proposed Debtor settlement with CLO Holdco (.4)	.80
01/25/21	PH Montgomery	Analyze issues regarding appeal processes (1.2); review of documents related to claims (1.2)	2.40
01/26/21	CM Rognes	Research re: motion to preserve (2.5); revise motion to preserve (0.7); review documents re: tax information (0.1); review, analyze recent Debtor production (0.5); correspond with P. Montgomery re: motion to preserve (0.1)	3.90
01/26/21	MA Clemente	Participate in preliminary injunction hearing (6.5); address emails with Sidley team re: Kirschner information (.3)	6.80
01/26/21	PP Reid	Participate in hearing on injunction against Advisors (6.5); emails with Sidley team regarding CLO Holdco settlement (.1); emails with team regarding privilege issues for Kirschner (.2)	6.80
01/26/21	DM Twomey	Emails with team regarding direct appeal issues (.20); analyze same issues (.30); review/assess CLOH settlement (.30); emails with team regarding same (.10); emails with team regarding competing plan response, related strategy (.30); listen to portion of hearing regarding KERP, injunction against Dondero (3.80); analyze related issues (.40)	5.40
01/26/21	M Abdul-Jabbar	Attend hearing (in part) on injunctive relief motion and proposed settlement between debtor and CLO Holdco (1.5); analyze extent to which settlement affects creditor committee's motion for preliminary injunction (.5)	2.00
01/26/21	J Hoffman	Attend (in part) TRO hearing in adversary proceeding	1.10

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Date	Name	Narrative	Hours
01/26/21	A Russell	Attend hearing re preliminary injunction against fund advisors (6.7); review update re Debtor settlement with CLO Holdco in resolution of same (.2); analyze document production update (.1).	7.00
01/26/21	PH Montgomery	Attend hearing on injunction (6.5); review and revise motion to compel preservation (1.8); correspondence with Sidley team regarding settlement issues (.3); review of common defense processes (.3)	8.90
01/26/21	EA Bromagen	Attend hearing on injunction motion (2.0); attend continued hearing on injunction motion (continued) (2.4); emails with J. Hoffman re 5th circuit appeals process and review of research on same (.6)	5.00
01/27/21	PP Reid	Participate in telephone conference with FTI and Sidley teams regarding case issues for UCC call (.5); review and revise motion to preserve evidence (.3); emails regarding same (.1); participate in call with Kischner (.7)	1.60
01/27/21	CM Rognes	Revise motion to preserve (0.1); log recent production by Debtor (0.2); review status of third party objector review (0.2); confer with litigation trustee and P. Montgomery re: litigation strategy (0.7); confer with litigation trustee, FTI, and P. Reid (in part) re: case background (1.0); correspond with bankruptcy team re: privilege issue (0.2); call with P. Montgomery re: outstanding tasks (0.2)	2.60
01/27/21	A Russell	Correspond with Sidley team re potential privilege issue re coordination with future litigation trustee.	.30
01/27/21	PH Montgomery	Call with M. Kirschner regarding litigation trust issues (.7); call with C. Rognes regarding outstanding document issues (.2); call with FTI and Sidley teams regarding strategy issues (.5); communications with objectors regarding data requests (.6)	2.00
01/27/21	DM Twomey	Review/analyze research summary on direct appeals (.30); emails with UCC, team regarding employee settlement offer (.20)	.50
01/28/21	T Nifong	Assemble chronology re: Hunter Mountain Transaction	2.70
01/28/21	CM Rognes	Draft chronology re: Hunter Mountain Trust transaction (2.1); revise motion to preserve (0.1); review status of objector document review (0.4); draft correspondence to third party objectors (0.2); review objector privilege log (0.1); review, analyze documents re: Hunter Mountain Trust (1.8); call with P. Montgomery re: outstanding tasks (0.5); document review (0.4); review local rules re: motion practice (0.2); correspond with T. Nifong re: Hunter Mountain Trust chronology (0.2); research re: service (0.1)	6.10

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Date	Name	Narrative	Hours
01/28/21	PP Reid	Review research on appeals to 5th Circuit (.6); emails with Sidley team regarding same (.2); emails with M. Kirschner regarding litigation trust issues (.4)	1.20
01/28/21	M Abdul-Jabbar	Review NexPoint privilege log	.30
01/28/21	PH Montgomery	Call with C. Rognes regarding discovery issues (.5); correspond with M. Abdul-Jabbar regarding privilege log (.2); review of documentation supporting potential claims (1.1)	1.80
01/28/21	DM Twomey	Emails with team regarding appeals process/timing questions (.30); analyze same issues (.40)	.70
01/29/21	PP Reid	Participate in Seery deposition (4.9); emails with Sidley team regarding CLO adversary proceeding (0.2)	5.10
01/29/21	CM Rognes	Correspond with P. Montgomery re: objector document review status (0.1); correspond with objectors re: document review status (0.2); draft chronology re: Hunter Mountain Trust (0.5); document review re: Hunter Mountain trust (0.3); correspond with M. Abdul-Jabbar re: privilege log (0.1); correspond with J. Hoffman re: motion to preserve (0.1); correspond with bankruptcy team re: privilege issue (0.2)	1.50
01/29/21	CM Rognes	Correspond with P. Montgomery re: CLO Holdco service (0.1); review rules re: service deadlines (0.2); correspond with J. Hoffman re: service deadlines (0.1)	.40
01/29/21	A Russell	Review, analyze Debtor's objection to Dondero emergency motion to continue contempt hearing.	.20
01/29/21	M Abdul-Jabbar	Analyze privilege log entries submitted by NexPoint Advisors in connection with raising objections regarding same	2.00
01/29/21	MA Clemente	Participate in Seery deposition	5.00
01/29/21	J Hoffman	Confer with Sidley litigation team re: adversary proceeding strategy (0.1); review, revise evidentiary motion (0.3); revise correspondence re: liquidating trustee (0.1)	.50
01/29/21	PH Montgomery	Attend Seery deposition (4.5); communications with P. Reid, C. Rognes and A. Russell regarding discovery issues (.5); communications with adversary defendants regarding response dates (.3)	5.30
01/31/21	CM Rognes	Revise motion to preserve (0.3); review local rules re: motion practice (0.2)	.50
Task Subtotal			395.20

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15 Plan and Disclosure Statement			
01/01/21	A Russell	Revise claimant trust agreement (.3); correspond with G. Demo re same (.1).	.40
01/04/21	MA Clemente	Review preliminary voting (.3); analysis of potential confirmation issues (.6); assess senior employee issues (.5)	1.40
01/04/21	A Russell	Correspond with G. Demo and Sidley team re revised trust agreements and resolution of open issues (.6); telephone conference with FTI team, E. Bromagen, and D. Pauker re asset profile overview for D. Pauker on-boarding (.6); correspond with M. Clemente re follow up from same (.2).	1.40
01/04/21	EA Bromagen	Review of revisions to trust agreements, emails with M. Clemente and A. Russell re same (.5); discuss filing of plan supplement documents with G. Demo (.1)	.60
01/05/21	MA Clemente	Emails with A. Russell re: extension of objection deadline and related issues (.2); read summary of objections (.4); begin reviewing various plan objections (.9); strategy regarding confirmation (.4)	1.90
01/05/21	A Russell	Review, analyze confirmation objections (2.1); draft summary of same for Committee (1.2); correspond with Sidley team re same, voting results (.6).	3.90
01/05/21	DM Twomey	Emails with FTI/Sidley teams regarding plan voting status update (.20); emails with team regarding plan objections (.20)	.40
01/05/21	EA Bromagen	Review objections to plan (1.5); research related to same (.4); research related to plan vote (1.8)	3.70
01/06/21	MA Clemente	Analysis of voting issues (.9); continued review and analysis of various objections (1.5); prepare strategy for confirmation (1.2)	3.60
01/06/21	A Russell	Correspond with Sidley and Pachulski team re resolution of open trust agreement issues (.2); review, analyze confirmation objections and strategize re Committee response (1.2); correspond with Sidley team re same, voting results (.4); correspond with Pachulski re coordination re confirmation (.1).	1.90
01/06/21	DM Twomey	Research regarding potential claims	.40
01/06/21	EA Bromagen	Review solicitation procedures and related plan confirmation issues (.4); emails with E. Cheng re same (0.1)	.50
01/07/21	MA Clemente	Sidley team call re: plan objections and strategy (1.1); call with Pachulski team re: plan objections (1.1); call with J. Pomertanz re: schedule (.3); call with D. Twomey re: confirmation strategy (.5); continued analysis of objections and responsive strategy (2.0); call with J. Seery re: plan issues (.5)	5.50
01/07/21	DM Twomey	Review/comment on preservation letter (.30); emails with team	6.80

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Date	Name	Narrative	Hours
		regarding same (.10); review/analyze plan confirmation objections, related issues (2.10); conference call with Sidley team regarding same, responses and next steps (1.10); post-call with M. Clemente regarding same (.50); read Dondero deposition transcript (.80); conference call with PSZYJ regarding plan confirmation objections, related arguments, issues and strategy (1.20); phone conference with M. Clemente regarding confirmation update, new timeline (.50); email to UCC regarding same, additional adversary filings (.20)	
01/07/21	A Russell	Telephone conference and correspond with Sidley team re strategy re confirmation objections (1.1); telephone conference with Sidley and Pachulski teams re same (1.2); review, analyze and strategize re same (.8); review, analyze update re confirmation issues and timing (.3).	3.40
01/07/21	EA Bromagen	Discuss confirmation strategy with M. Clemente, A. Russell, D. Twomey, P. Montgomery (1.1); discuss confirmation strategy with Pachulski and Sidley teams (1.2); review of confirmation objections and plan issues (.7)	3.00
01/08/21	MA Clemente	Analysis of Judge comments re: pot plan (.3); email from M. Lynn re: pot plan (.1); review prior draft termsheet from debtor which Mr. Dondero did not comment on (.7); carefully compare potential recoveries under liquidating plan and pot plan with D. Twomey (.6); emails with Sidley/FTI regarding same (.2); prepare responsive email to M. Lynn (0.3)	2.20
01/08/21	A Russell	Correspond with Pachulski team re ballots (.2); review, analyze same (.4); correspond with Sidley and Pachulski team re new confirmation dates (.3).	.90
01/08/21	EA Bromagen	Emails with M. Clemente and A. Russell re Dondero pot plan negotiations	.30
01/09/21	MA Clemente	Finalize email re: pot plan (.2); analysis of M. Lynn response (.3); review prior proposal terms (.4); emails with E. Bromagen re: prior proposals (.2); assess issues with pot plan (.9); analyze FTI materials on recoveries under liquidating plan (0.6)	2.60
01/09/21	A Russell	Correspond with Sidley team re correspondence from M. Lynn re Dondero pot plan and open issues re same (.4); review, analyze open issues re Dondero proposal (.2).	.60
01/09/21	EA Bromagen	Emails with M. Clemente re communications with Dondero counsel re settlement proposal	.30
01/10/21	MA Clemente	Review further correspondence from M. Lynn (.1); analysis of pot plan issues and uncertainty of terms (.5)	.60
01/10/21	MA Clemente	Analysis of Seery email regarding employee bonuses (.3); emails with E. Bromagen and A. Russell re: employee claims (.3)	.60

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Date	Name	Narrative	Hours
01/10/21	A Russell	Correspond with Sidley team re correspondence from M. Lynn re Dondero pot plan and open issues re same.	.60
01/10/21	EA Bromagen	Revise retained causes of action schedule and email to G. Demo regarding same (.2); review communications with Dondero counsel re settlement proposal (.2)	.40
01/11/21	MA Clemente	Evaluate various issues raised with Mr. Dondero's pot plan (.6); calls with E. Bromagen regarding same (.2); call with D. Twomey regarding same (.7); work on proposal regarding employees (.7)	2.20
01/11/21	A Russell	Review, analyze updates and related correspondence from opposing counsel re Dondero plan proposal.	1.20
01/11/21	DM Twomey	Phone conference with M. Clemente regarding confirmation issues, strategy, note repayment issue (.70); review plan voting information (.20)	.90
01/11/21	EA Bromagen	Calls with M. Clemente re Dondero proposal (.2); consider plan confirmation strategy (.8); emails with M. Clemente, A. Russell Sidley and FTI teams re same (.4); calls with G. Demo re same (.2); emails with E. Cheng re Dondero settlement proposal and review of communications re same (.6) review of voting tabulation and class acceptance issues, review of Plan re same (.7)	2.90
01/12/21	MA Clemente	Analysis of proposals regarding employees (.5); analysis of voting and accepting class issues (.7); assess employee claims and treatment (0.3)	1.50
01/12/21	A Russell	Correspond with Pachulski re compensation of D. Pauker and M. Kirschner for disclosure at confirmation (.2); review, comment on comparison of Plan and Dondero proposal for Committee review (.9); correspond with Sidley and FTI team re same (.6).	1.70
01/12/21	DM Twomey	Emails with team regarding plan confirmation issues (.20); analyze same issues (.30); emails with Sidley team regarding response to Dondero plan proposal (.20)	.70
01/12/21	EA Bromagen	Emails with E. Cheng re summary of Dondero proposal (.3); examine draft summary of Dondero proposal (.6); consider and draft committee response to Dondero proposal (1.9); emails with A. Russell and M. Clemente re same (.3); discussions with M Clemente re same (.2); further consideration of same and drafting of response to same (.9)	4.20
01/13/21	MA Clemente	Further analysis of correspondence from Mr. Dondero's counsel re: proposals and issues related to pot plan (.8); prepare further response to pot plan issues (.7)	1.50
01/13/21	A Russell	Draft response to Dondero proposal (1.2); correspond with	1.60

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Date	Name	Narrative	Hours
		Sidley and FTI teams re same (.4)	
01/14/21	MA Clemente	Draft detailed response email to M. Lynn re: pot plan (1.0); review revisions to email from D. Twomey (.1)	1.10
01/14/21	MA Clemente	Call with J. Pomerantz re: Seery compensation (.3); emails to A. Russell and E. Bromagen re: Seery comp (.2)	.50
01/14/21	DM Twomey	Emails with team regarding trustee compensation issues (.20); emails with team regarding fee reimbursement issues (.20); correspond with M. Clemente regarding confirmation, examiner and other issues (.40); analyze confirmation/voting issues (0.2)	1.00
01/15/21	MA Clemente	Call with J. Pomerantz re: Seery compensation (.3); call with J. Pomertantz re: comp and other proposals (.3); call with D. Twomey re: plan strategy (.5); work on Seery compensation proposal (.4); review prior proposals and responses (.3); emails with A. Russell re: Seery proposals (.3); read and consider Dondero proposal (.9); analysis of recoveries under Dondero proposal (.5); analysis of structure of Dondero proposal (.7); emails with A. Russell and E. Bromagen re: Dondero proposal (.4); emails with FTI re: NAV and issues on Dondero proposal (0.5)	5.10
01/15/21	A Russell	Correspond with E. Bromagen re outline of confirmation statement (.2); review, analyze response to Dondero plan proposal and correspondence re same (1.1); review, analyze Claimant Trustee compensation proposal (.2); correspond with Sidley team re same (.3); review, analyze confirmation objections for Committee response (.6).	2.40
01/15/21	DM Twomey	Review Dondero plan proposal (.30); analyze related issues (.80); phone conference with M. Clemente regarding Dondero proposal, related issues and strategy (.50); emails with Sidley/FTI teams regarding Dondero proposal, related issues (.40); emails with team regarding oversight/compensation issues (.20)	2.20
01/15/21	EA Bromagen	Emails with G. Demo re litigation trustee role (.2); emails with Sidley team re proposed trustee compensation (.3); review Dondero proposal term sheet and emails with Sidley team and FTI team re same (1.1); emails with FTI team re proposed bonuses (.2)	1.80
01/18/21	MA Clemente	Emails with E. Bromagen re: Dondero response (.3); analysis and assess Dondero proposals and structure and responses (.9); call with D. Twomey regarding same (.5)	1.70
01/18/21	A Russell	Review, analyze and correspond with Sidley team re Dondero plan proposal (.6); draft, revise Committee's confirmation statement (1.2)	1.80

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Date	Name	Narrative	Hours
01/18/21	DM Twomey	Emails with team regarding response to Dondero proposal (.30); phone conference with M. Clemente regarding same, Dondero proposal, next steps (0.5)	.80
01/18/21	EA Bromagen	Review Dondero proposal along with Debtor projections and consider response to Dondero proposal (2.1); discuss same with D. O'Brien (.9); emails with M. Clemente re same (.3); further discuss same with D. O'Brien (.1); draft response to Dondero proposal (.6); emails with Sidley and FTI team re same (.2)	4.20
01/19/21	R Fink	Consolidate research regarding amendment of indemnification clauses	.70
01/19/21	R Fink	Conference with E. Bromagen, M. Clemente, D. Twomey, A. Russell regarding UCC filing in support of reorganization plan	.60
01/19/21	R Fink	Research regarding plan vote issues	2.10
01/19/21	R Fink	Confer with E. Bromagen regarding research regarding partnership agreements	.20
01/19/21	R Fink	Research regarding indemnification	2.70
01/19/21	M Abdul-Jabbar	Confer with E. Cheng and Sidley team regarding strategy relating to liquidation plan and upcoming hearings	.60
01/19/21	DM Twomey	Review voting report (.30); analyze related confirmation issues (.20); review draft confirmation response (.30); analyze confirmation issues (.80); emails with M. Clemente, P. Montgomery regarding Select issue (.20); phone conference with M. Clemente regarding confirmation response, related issues and strategy (.40); conference call with team regarding draft confirmation response, topics for addition (.60); emails with PSZYJ, team regarding employee settlement stipulation (.20)	3.00
01/19/21	MA Clemente	Revisions to proposed response to Dondero (.4); call with E. Bromagen re: response to Dondero (.3); call with Dondero and Bonds regarding plan issues (.5); call with J. Bonds re: termsheet (.1); call with J. Seery re: plan issues (.4); call with Sidley team re: confirmation response strategy (.6); assess confirmation response strategy (.3); read Dugaboy objection (.5); review matrix of objections (.4); prepare response strategy (.8); call with E. Bromagen re: indemnification and related issues (.3); address emails with E. Bromagen and A. Russell re: employee stipulation (.2); review draft employee stipulation (.2)	5.00
01/19/21	A Russell	Draft, revise Committee's confirmation statement (4.2); research for same (.5); telephone conference with Sidley team regarding same (.6); correspond with Sidley team re same (.5); correspond with Pachulski re status of confirmation objections (.1); correspond with Sidley team re updates for Kirschner (.2);	6.90

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Date	Name	Narrative	Hours
		review, analyze updates and correspondence re Dondero plan proposal and remaining issues re same (0.8)	
01/19/21	EA Bromagen	Discuss partnership agreement plan issues with G. Demo (.3); discuss same with M. Clemente (.3); discuss same with R. Fink (.1); research and consideration of same issue (.6); discuss Dondero proposal with E. Cheng (.1); discuss various plan issues with A. Artwalla (.1); review of draft response in support of confirmation (.5); call with A. Russell, M. Clemente, D. Twomey re response to confirmation objections (.6); emails with A. Russell, R. Fink re same (.1); research related to same (.6); review filed voting report (.1); review retention bonus plan motion (.4)	3.80
01/20/21	R Fink	Draft summary of research regarding plan vote issues	.70
01/20/21	DM Twomey	Correspond with M. Clemente regarding confirmation issues, Dondero revised proposal (.30); analyze issues with Dondero proposal (.30); conference call with M. Clemente, E. Bromagen, A. Russell regarding confirmation issues, analysis and follow-up tasks (1.60); post-call analysis of confirmation issues (.90); emails with M. Clemente regarding response to Dondero counsel, comments to same (.30); emails with team regarding employee settlement offer, related issues (.20); analyze same issues (.20); emails with M. Clemente regarding plan implementation issue (.20); emails with FTI regarding same (.10); analyze same issue (.30); emails with PSZYJ, team regarding revised plan provisions, related issues (.20); analyze same issues (0.5)	5.10
01/20/21	MA Clemente	Call with D. Twomey, A. Russell and E. Bromagen re: exculpation, gatekeeper provision and strategy (1.6); call with J. Pomerantz re: plan issues (.3); prepare responsive email to Dondero (.4); assess plan issues raised by Pomerantz (.8); call with J. Pomerantz re: employee objections (.3); detailed email to FTI and team re: employee objections (.2); emails with FTI re: insurance issues (.3)	3.90
01/20/21	A Russell	Telephone conference with Sidley team re confirmation issues and strategy (1.6); research re confirmation issues (2.2); correspond with Sidley team re and analyze same (.8); review, analyze precedent re confirmation statement (.8); revise confirmation statement (1.5).	6.90
01/20/21	EA Bromagen	Research plan objection issues (2.5); discuss certain plan objection issues with M. Clemente, D. Twomey, and A. Russell (1.6); further research on certain plan issues (3.1); emails with team re same (.2)	7.40
01/21/21	R Fink	Confer with E. Bromagen regarding revisions to injunction language in plan of reorganization	.30

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Date	Name	Narrative	Hours
01/21/21	R Fink	Research and synthesize injunction language from previous iterations of Plan of Reorganization	1.20
01/21/21	DM Twomey	Draft preliminary statement for confirmation response (2.60); analyze related confirmation issues (.60); review draft confirmation response (.40); emails with team regarding preliminary statement, confirmation response (.20); emails with team regarding plan release/injunction provisions, related objections (.30); phone conferences with M. Clemente regarding Dondero proposal, confirmation/implementation issues (.40); analyze plan implementation issues (.50); confirmation call with M. Clemente, J. Dondero counsel regarding alternative plan (.60); post-calls with M. Clemente regarding same, next steps, summary for UCC (.30); emails with PSZYJ, team regarding confirmation timeline (.10); emails with PSZYJ regarding employee stipulation, related review (0.3)	6.30
01/21/21	MA Clemente	Call with D. Twomey re: plan issues (.4); detailed update email to FTI team re: discussions regarding Dondero plan (.3); address Dondero proposals (.8); address D&O issues and strategy (.6); call with Dondero's counsel and D. Twomey re: proposal (.6); post calls with D. Twomey regarding same (.3); review draft response to plan objections (.9); review Debtor's response to plan objections (.5); prepare settlement proposed for Leventon and Ellington (.3); analyze Pauker compensation (.2); call with P. Casey regarding employment issues (.2); emails with A. Russell re: draft response (.1); address timing of confirmation hearing (.2); email with J. Pomerantz re: timing (.1); analysis of confirmation strategy and issues (1.1)	6.60
01/21/21	A Russell	Review, analyze legal research re issues for confirmation statement (1.8); correspond with Sidley team re same (.9); correspond with Pachulski re Debtor's confirmation reply and brief (.2); review, analyze same (.4); review, revise Committee's confirmation statement (3.4).	6.70
01/21/21	A Russell	Correspond with Sidley and Pachulski teams re compensation for Pauker, Kirschner, and Seery re Claimant and Litigation trusts.	.30
01/21/21	WA Evanoff	Analyze issue re post-petition injunction (.9); call with E. Bromagen re same (.4)	1.30
01/21/21	EA Bromagen	Review and consider plan objection issues (1.1); discuss jurisdiction issue with W. Evanoff (.4); emails with W. Evanoff re same (.2); discuss plan revisions with R Fink (.3); research re plan objections and draft and review committee response to plan objections (3.2) emails with M. Clemente and Committee re independent director role compensation (.3); emails with A. Russell re committee response to plan objections (.5)	6.00

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Date	Name	Narrative	Hours
01/22/21	J Hoffman	Review response in support of confirmation (0.2); finalize and file response (0.2); review objections to confirmation and new filed pleadings (0.3)	.70
01/22/21	DM Twomey	Review plan revisions and related analysis of release/injunction provisions (1.20); review/assess revised Dondero term sheet (.50); analysis of confirmation and other case issues (.70); emails with team regarding confirmation pleading, filing of same (.30); analyze plan implementation issues (.60); emails with PSZYJ, team regarding same, related documents (.30)	3.60
01/22/21	MA Clemente	Draft and revise committee response (1.1); analysis of revised Dondero proposal and redlines of prior proposals (.9); strategy regarding confirmation (.7); analysis of options and alternatives regarding D&O issues (.6); analyze employee stipulations (.4); further review of response in support (.5); address email from M. Lynn re: Dondero proposal (.1); call with CAC specialty re: D&O insurance (.4)	4.70
01/22/21	A Russell	Review, revise, and finalize confirmation statement for filing (2.3); review, analyze Latham comments re same (.2); review, analyze, and correspond with Sidley and FTI teams re post-effective date D&O issues (.4); review, analyze revised Dondero plan term sheet (.3); correspond with Sidley and FTI teams re same (.2).	3.40
01/22/21	EA Bromagen	Review revised Dondero proposal and comparison with prior proposals (.6); emails with Sidley and FTI teams, Committee re same (.2); review and revise Committee response to confirmation objections (1.2); further review and finalization of same (.8); emails with J. Hoffman re filing of same (.1)	2.90
01/23/21	MA Clemente	Analysis of most recent Dondero proposals (.5); strategy re: Dondero proposals (.5)	1.00
01/24/21	DM Twomey	Emails with Dondero counsel, PSZYJ regarding competing plan proposal (.20); analyze related plan/solicitation issues (.20); emails with Sidley/FTI team regarding Dondero competing plan proposal (.20); emails with FTI/Sidley teams regarding insurance issues (.10); analyze same issues (.40); emails with team regarding Dondero entity administrative claim motion, related issues (.20)	1.30
01/24/21	MA Clemente	Email from Dondero re: plan (.1); review Dondero plan (.8); emails with Dondero counsel re: plan (.2); call with J. Pomerantz re: Dondero plan (.3); internal Sidley emails regarding Dondero plan and strategy (.3); analysis of strategy re: Dondero plan and sealing issues (.9)	2.60
01/24/21	EA Bromagen	Research confirmation issues related to injunction	1.20
01/25/21	DM Twomey	Conference call with Debtor, UCC, broker regarding insurance	3.30

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		issues (.90); post-call with M. Clemente regarding same, next steps (.20); conference call with alternative broker, M. Clemente regarding insurance issues (.40); analyze insurance and confirmation issues (.40); emails with team regarding Dondero plan (.20); call with M. Clemente, E. Bromagen, A. Russell regarding confirmation issues, next steps (.80); analyze confirmation and other case issues, strategy (.40)	
01/25/21	MA Clemente	Call with D&O broker, Pachulski and FTI re: policy (.9); call with D. Twomey re: D&O issues (.2); call with CAC and D. Twomey re: D&O (.4); team call with E. Bromagen, D. Twomey and A. Russell re: strategy (.8); review Dondero plan (.7); email with J. Bonds re: Dondero plan (.1); review seal motion (.2); strategize regarding seal motion (.4); call with J. Pomerantz re: issues regarding plan (.3); prepare strategy regarding plan confirmation (.6); call with E. Bromagen regarding same (.5); analysis of distributable value comparisons (.4)	5.50
01/25/21	A Russell	Telephone conference with Sidley team re follow up from Board call re confirmation issues (.8); review, analyze revised Debtor plan documents (.9); correspond with Sidley team, Latham re same, comments (.4); review, analyze and summarize Dondero plan (2.9); correspond with Sidley and FTI teams re same, next steps (.6)	5.60
01/25/21	EA Bromagen	Call with M. Clemente re plan confirmation issues (.5); call with M. Clemente, D. Twomey, and A. Russell re confirmation issues (.8); discussion and emails with F. Smith re employee claims asserted in Dondero proposed plan (.3); review of documents re same (.3)	1.90
01/25/21	EA Bromagen	Review emergency motion to file competing plan under seal, emails with M. Clemente re same	.50
01/26/21	MA Clemente	Prepare comments regarding Dondero plan (.3); address seal motion related to Dondero plan (.3); assess appellate issues (.4)	1.00
01/26/21	J Hoffman	Research re: post-confirmation issues with plan (1.1); research equitable mootness issues (0.3); review, analyze plan terms and objections to same (0.5) call with R. Velevis to discuss 5th Cir. standards and procedure (0.3); confer with Sidley team re: potential confirmation issues (0.3); draft analysis of research re: plan provisions (0.5)	3.00
01/26/21	A Russell	Correspond with FTI and Sidley teams re analysis and comparison of Dondero plan versus Debtor plan (.6); review, comment on same (.2); telephone conference with E. Bromagen, D. O'Brien, and E. Cheng re same (.2); correspond with Sidley team re NexPoint motion to file Dondero plan under seal and Committee response for same (.3); analyze withdrawal of T. Surgent and F. Waterhouse confirmation	1.40

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Date	Name	Narrative	Hours
		objection (.1)	
01/26/21	EA Bromagen	Participate in preliminary injunction hearing (6.5); address emails with Sidley team re: Kirschner information (0.3)	1.60
01/27/21	MA Clemente	Call with E. Bromagen re: various issues (.4); review detailed email from FTI re: comparison of Dondero proposal (.3); call with J. Terry and FTI and D&O broker (.8); call with J. Pomerantz re: D&O insurance (.3); prepare responsive email to Dondero (.4); review Dondero plan and classification and distribution provisions (.5); evaluate employee settlement issues (.3)	3.00
01/27/21	J Hoffman	Research re: post-confirmation issues with plan (2.1); draft analysis of research re: same (0.5)	2.60
01/27/21	A Russell	Telephone conference with J. Pomerantz re update re D&O insurance and resolution of S. Ellington and I. Leventon confirmation objection (.2); correspond with M. Clemente and E. Bromagen re follow up from same (.1); draft summary of resolution of Ellington and Leventon confirmation objection and correspond with Committee re same (.3); review, analyze and comment on updated comparison of Dondero vs Debtor plans (0.6)	1.20
01/27/21	EA Bromagen	Review Dondero plan and comparison analysis (.4); discuss case confirmation and various issues with M. Clemente (.7); consider confirmation related issues (.5); call with FTI, J. Terry, M. Clemente, and insurance brokers re D&O insurance issue (.7); draft proposed response to Dondero proposal (.4)	2.70
01/28/21	MA Clemente	Prepare Dondero response (.4); emails with J. Pomerantz re: D&O (.3) address issues regarding claimant trust compensation (.4); prepare for confirmation (1.6); call with D. Twomey regarding confirmation issues (.2); emails with E. Bromagen re: plan provisions (.2); analysis of potential appeals and related timing (.7); email to counsel for Dondero re: plan (.2)	4.00
01/28/21	IC Ferrell	Research, analyze, and summarize precedent documents and case law re interim distributions (5.0); confer with E. Bromagen re project assignment (.5)	5.50
01/28/21	A Russell	Review, analyze ongoing correspondence and updates re Dondero plan counterproposal (.8); telephone conference with E. Bromagen and D. Twomey re open issues re post-confirmation (.7); correspond with M. Clemente re P. Daugherty response to Committee's confirmation reply (.2); correspond with E. Bromagen re status of confirmation order and revised Debtor projections (.2); review, analyze ongoing correspondence and analyses re appellate time line and applicable law re potential appeal of confirmation order (.7); research, review, analyze case law re interim distributions	8.00

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Date	Name	Narrative	Hours
		(4.6); correspond with Sidley team re same, summary of findings (.8).	
01/28/21	DM Twomey	Phone conference with M. Clemente regarding confirmation issues, potential plan scenarios (.20); conference call with E. Bromagen, A. Russell regarding recent plan changes, distribution timing issues (.70); emails with team regarding same (.30); emails with FTI, M. Clemente regarding plan trustee question (.20)	1.40
01/28/21	J Hoffman	Research re: confirmation issues (2.1) draft analysis of same (0.6); draft timeline for post-confirmation issues (0.3)	3.00
01/28/21	EA Bromagen	Call with D. Twomey and A. Russell re confirmation issues (.7); calls with R. Fink and I. Ferrell re research issues related to confirmation (.5); review results of research re interim distributions (.6); review plan and plan documents and analyze changes (2.4); emails with M. Clemente, D. Twomey, A. Russell re same (.5); emails with G. Demo re plan confirmation (.3); discuss plan confirmation strategy with G. Demo (.2); emails with M. Clemente, D. Twomey, A. Russell re same (.3); research re 5th circuit plan injunctions and related confirmation strategy (1.1)	6.60
01/28/21	R Fink	Synthesize research and draft memoranda regarding interim distributions to unsecured creditors (1.1); draft email correspondence to A. Russell, E. Bromagen, and I. Ferrell regarding research findings for interim distributions to unsecured creditors (.4); confer with E. Bromagen on research regarding distributions to unsecured creditors prior to plan effective date (.5); research legal standard and availability of interim distributions to unsecured creditors (3.9)	5.90
01/29/21	A Russell	Attend deposition of J. Seery (in part) re confirmation (2.5); correspond with Sidley team re updates re same (.3); correspond with Latham re question re revised projections (.1); correspond with Sidley and FTI teams re same (.2); review, analyze update and correspondence re Dondero plan negotiations (.3); correspond with E. Bromagen and M. Clemente re follow up with D. Pauker re oversight board issues (.2).	3.60
01/29/21	MA Clemente	Call with D&O broker, Dubel and Pachulski (.7); emails with E. Bromagen re: Pauker (.1)	.80
01/29/21	TD Cunningham	Email exchange with M. Clemente re: D&O issue (.2); telephone conference with E. Bromagen re: same and additional detail (.5); brief research re: case issue and potential next steps (.8)	1.50
01/29/21	DM Twomey	Emails with FTI/Sidley regarding insurance, confirmation and related updates (.20); review plan change summary and related	.50

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Date	Name	Narrative	Hours
		emails (.30)	
01/29/21	EA Bromagen	Review revised debtor projections (.2); emails with FTI team re same (.2); discussions with E. Cheng re plan confirmation (.3); discuss revised plan documents with G. Demo (.1); call with D. Pauker re confirmation status and related issues (.5); emails with M. Clemente, P. Montgomery, P. Reid re same (.3); discuss D&O issue with T. Cunningham (.5); emails with M. Clemente re same (0.2)	2.30
01/30/21	MA Clemente	Email from M. Lynn re: Dondero proposal (.1); review and address emails with A. Bromagen re: plan changes (.3); emails with E. Bromagen re: changes to the plan (.3); prepare for confirmation hearing (1.1)	1.80
01/30/21	DM Twomey	Review emails, materials regarding plan changes (.30); emails with team regarding same, follow-up questions, comments (.20); review updates/materials regarding depositions (.20); review recently-filed confirmation pleadings, hearing information (.40)	1.10
01/30/21	EA Bromagen	Emails with Pachulski and Sidley teams re revisions to Plan (.5); review plan and consider revisions issues (.3)	.80
01/31/21	MA Clemente	Address emails with E. Bromagen re: plan changes (.2); review objections for plan confirmation hearing preparation (1.0)	1.20
01/31/21	A Russell	Review, analyze Debtor's plan revisions (.2); correspond with Sidley team re same, confirmation order (.3)	.50
01/31/21	DM Twomey	Emails with FTI regarding trustee question (.10); emails with team regarding confirmation hearing and plan updates (.20); analyze confirmation/appeal issues (.30)	.60
01/31/21	EA Bromagen	Emails with Sidley and Pachulski team re revisions to plan and plan documents (.5); discuss same with J. Fried (.3); consider same issues (.3)	1.10
Task Subtotal			272.10
24 Creditor Communications			
01/04/21	MA Clemente	Call with J. Terry re: various issues	.40
01/08/21	MA Clemente	Email with J. Terry re: pot plan (.1); email with E. Felton re: pot plan (.1); call with J. Terry re: various issues (.4)	.60
01/09/21	MA Clemente	Email from E. Felton re: pot plan (.1); email with committee re: pot plan (.1)	.20
01/10/21	MA Clemente	Email with Committee re: pot plan (.1); address email from J. Terry re: pot plan (.1)	.20
01/11/21	MA Clemente	Call with M. Hankin re: various issues (.3); call with J. Terry re: various issues (.5)	.80

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Date	Name	Narrative	Hours
01/12/21	MA Clemente	Call with E. Felton re: various issues	.40
01/13/21	MA Clemente	Call with counsel for S. Ellington re: pot plan (.4); call with J. Terry re: various issues (.4); call with E. Felton re: various issues (.2)	1.00
01/14/21	MA Clemente	Call with J. Terry re: various issues	.40
01/15/21	MA Clemente	Call with E. Felton re: various issues (.3) call with J. Bjork re: various issues (.3); prepare detailed email to committee re: Seery compensation and Dondero proposal (.8)	1.40
01/18/21	MA Clemente	Call with P. Daugherty re: various issues	.50
01/19/21	MA Clemente	Call with J. Terry re: various issues (.4); email from Jenner re: Dondero proposal (.1)	.50
01/20/21	MA Clemente	Call with J. Terry re: D&O issues (.4); email with M. Hankin re: various issues (.1); emails with Latham re: plan issues (.2)	.70
01/21/21	MA Clemente	Call with LW re: various issues (.8); call with J. Terry re: various issues (0.4)	1.20
01/21/21	DM Twomey	Conference call with Latham, M. Clemente regarding Dondero proposal, related issues	.80
01/25/21	MA Clemente	Call with E. Felton re: D&O issues (.2); call with J. Terry re: various issues (.5); detailed email to the committee re: status (.3); call with M. Hankin re various issues (.3)	1.30
01/26/21	MA Clemente	Call with P. Daugherty re: various issues	.30
01/27/21	MA Clemente	Call with J. Terry re: D&O issues	.30
01/28/21	MA Clemente	Email with J. Terry re: D&O (.1); address email from P. Daugherty regarding response (.3); call with J. Terry re: update on D&O (.1)	.50
Task Subtotal			<u>11.50</u>
Total Hours for all Tasks			873.70

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T A S K D E T A I L

Date	Name	Narrative	Hours
05 Committee Meetings			
02/04/21	R Fink	Participate (in part) in weekly UCC call regarding debrief from confirmation hearing	1.00
02/04/21	T Nifong	Participate in UCC Committee Standing Call	1.10
02/04/21	J Hoffman	Attend weekly Committee meeting	1.10
02/04/21	MA Clemente	Participate in committee meeting regarding confirmation, Dondero proposal and next steps (in part)	1.00
02/04/21	A Russell	Attend weekly Committee meeting regarding confirmation issues, Dondero and next steps	1.10
02/04/21	PG Foley	Attend UCC call regarding confirmation hearing and competing plan (1.1); review related correspondence with Sidley team regarding plan issues (.2)	1.30
02/04/21	PP Reid	Participate in UCC call regarding confirmation and Dondero proposal	1.10
02/04/21	PH Montgomery	UCC meeting regarding confirmation, Dondero proposal and next steps	1.10
02/04/21	EA Bromagen	Call with Committee re confirmation hearing and competing plan	1.10
02/04/21	CM Rognes	Attend UCC call regarding confirmation and next steps	1.10
02/04/21	DM Twomey	Weekly conference call with UCC/advisors regarding confirmation, Dondero proposal, next steps	1.10
02/10/21	R Fink	Participate in weekly UCC meeting re- case administration post-confirmation	1.00
02/10/21	T Nifong	Participate in Standing Sidley/UCC call regarding case issues and next steps	1.00
02/10/21	MA Clemente	Call with the Committee regarding case issues	1.00
02/10/21	A Russell	Attend weekly Committee meeting regarding case issues	1.00
02/10/21	PP Reid	Participate in weekly committee call regarding case issues, next steps	1.00
02/10/21	PH Montgomery	Participate in weekly UCC meeting regarding case issues and next steps	1.00
02/10/21	CM Rognes	Attend UCC call regarding case issues, next steps	1.00
02/10/21	DM Twomey	Weekly conference call with UCC/professionals regarding case	1.00

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Date	Name	Narrative	Hours
		issues, next steps	
02/10/21	EA Bromagen	Weekly call with Committee and advisors re various issues, preparation for same	1.00
02/12/21	PP Reid	Participate in Committee call post board meeting	.90
02/12/21	MA Clemente	Meeting with the Committee regarding board call, case issues and next steps	.90
02/12/21	A Russell	Attend Committee meeting (in part) re follow up and next steps following Board call.	.80
02/12/21	CM Rognes	Attend UCC meeting call re next steps following Board call	.90
02/12/21	PH Montgomery	Attend UCC meeting (in part) regarding next steps following board call	.50
02/12/21	DM Twomey	Conference call with UCC/advisors regarding case issues, Dondero proposal, next steps	.90
02/12/21	EA Bromagen	Call with Committee re board call next steps and Dondero proposal	.90
02/17/21	R Fink	Participate and draft notes for weekly UCC meeting regarding current case issues	.50
02/17/21	T Nifong	Participate in UCC call regarding current case issues	.50
02/17/21	J Hoffman	Attend weekly Committee call regarding current case issues	.50
02/17/21	MA Clemente	Participate in committee call regarding various case issues	.50
02/17/21	A Russell	Telephone conference with Sidley, FTI, and Committee members re current case issues.	.50
02/17/21	PP Reid	Participate in UCC call regarding various case issues	.50
02/17/21	PH Montgomery	Attend weekly UCC meeting regarding various case issues	.50
02/17/21	CM Rognes	Attend UCC call regarding various case issues	.50
02/17/21	DM Twomey	Weekly conference call with UCC, professionals regarding various case issues	.50
02/17/21	EA Bromagen	Weekly call with committee and professionals re various issues (.5); preparation for same (.3); emails with Sidley and FTI teams re draft agenda for same (.3)	1.10
Task Subtotal			32.50
06 Business Operations			
02/10/21	MA Clemente	Call with J. Seery re: various issues	.50
02/10/21	A Russell	Correspond with Sidley and FTI team re Debtor's 13-week cash roll-forward and request for post-confirmation budget	.40

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Date	Name	Narrative	Hours
02/11/21	A Russell	Review, analyze FTI update re status of Debtor's 13-week budget.	.20
02/12/21	MA Clemente	Call with J. Seery re: various issues	.40
02/17/21	MA Clemente	Call with J. Seery re: various issues	.70
02/18/21	MA Clemente	Call with J. Seery re: various issues (.5); address deferred compensation proposal from Seery (.4)	.90
02/25/21	MA Clemente	Review analysis of 13 week cash flow (.3); email to FTI re: same (.1)	.40
02/25/21	A Russell	Review, analyze FTI correspondence and update re Debtor's 13-week cash flow/budget.	.30
Task Subtotal			3.80
07 Case Administration			
02/01/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues (1.0); correspond with Sidley and FTI teams regarding same (.1)	1.10
02/01/21	J Hoffman	Draft updated case timeline for committee (0.5); review case pleadings and deadlines (0.2) correspondence with debtor counsel re: disposition schedule (0.1); correspondence with G. Demo, FTI team re: update conflicts procedures (0.2); correspondence with KCC team re: service for FTI (0.1); correspondence with opposing counsel re: adversary proceeding pleadings (0.1); analyze proposal from opposing counsel (0.1)	1.30
02/01/21	MA Clemente	Team call with FTI re: various issues	1.00
02/01/21	DM Twomey	Weekly conference call with FTI/Sidley team regarding confirmation preparation/issues, other case tasks/issues	1.00
02/02/21	J Hoffman	Call with court re: hearing matters and transcript request	.10
02/02/21	MA Clemente	Call with J. Seery re: various issues (.4); call with J. Pomerantz re: various issues (.2)	.60
02/03/21	EA Bromagen	Emails with M. Clemente and Committee re agenda for committee meeting (.2); emails with G. Demo re scheduling Committee and Board meetings (.1)	.30
02/04/21	T Nifong	Participate in standing pre-UCC call in preparation for Committee meeting (.9); review materials for same (.1)	1.00
02/04/21	CM Rognes	Attend pre-UCC call with Sidley and FTI	.90
02/04/21	J Hoffman	Correspondence with debtor's counsel re: transcripts (0.1); emails with court regarding payment of transcripts (0.1)	.20
02/04/21	DM Twomey	Conference call with FTI/Sidley team (in part) regarding	1.10

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Date	Name	Narrative	Hours
		preparation for upcoming UCC call, related issues and materials (.40); emails with FTI/Sidley regarding Dondero proposal materials/comparisons and review same (.30); phone conference with M. Clemente regarding same, upcoming UCC call, next steps (.40)	
02/04/21	MA Clemente	Team call with FTI regarding committee meeting (.9); prepare for committee meeting (.8); call with D. Twomey regarding same (.4); emails with E. Bromagen re: trust beneficiaries (.2)	2.30
02/04/21	A Russell	Telephone conference with Sidley and FTI teams re coordination and preparation for Committee meeting (.9); correspond with FTI and Sidley teams regarding same (.2)	1.10
02/04/21	EA Bromagen	Emails with M. Clemente and emails and calls with E. Cheng re HCLOF request for creditor information (.4); emails with Committee members re same (.3); discuss same with G. Demo (.2)	.90
02/05/21	J Hoffman	Review new filed pleadings (0.1); draft updated case timeline (0.3)	.40
02/08/21	MA Clemente	Call with Pomerantz re: various issues (.4); call with D. Twomey re: strategy issues (.5); prepare workstream outline for various post confirmation issues (.9); team call with FTI re: various issues (1.0)	2.80
02/08/21	J Hoffman	Analyze conflicts list for FTI team (0.1); revise case calendar for Sidley team (0.2); correspondence with debtor counsel re: deposition schedules (0.1)	.40
02/08/21	A Russell	Telephone conference with Sidley and FTI teams re case issues	1.00
02/08/21	DM Twomey	Weekly conference call with FTI/Sidley regarding plan confirmation, implementation issues, Dondero proposal (1.0); analyze related issues (.30)	1.30
02/08/21	EA Bromagen	Emails with M. Clemente re requests for proposals for trustee positions (.1); review of emails with J. Hoffman re timeline for appeals process and further emails re same (.2); emails with G. Demo re Board call (.1); draft update email to Committee re various issues (.3)	.70
02/09/21	J Hoffman	Update case calendar (0.4); correspondence with debtor counsel re: deposition dates (0.1)	.50
02/10/21	DM Twomey	Pre-call with FTI/Sidley teams regarding case issues, preparation for UCC call	.50
02/10/21	CM Rognes	Attend pre-UCC call with Sidley and FTI	.50
02/10/21	MA Clemente	Call with FTI to prepare for committee meeting (.5); prepare for Committee meeting (1.2);	1.70

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Date	Name	Narrative	Hours
02/10/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee call (.5); correspond with J. Hoffman re updated case schedule (.2).	.70
02/10/21	EA Bromagen	Emails with M. Clemente and Sidley and FTI teams re agenda for Committee meeting (.2); email to Committee re same (.1); pre call with FTI and Sidley teams re committee meeting (.5)	.80
02/11/21	J Hoffman	Review new case pleadings (0.2); update case calendar re: same (0.2)	.40
02/11/21	DM Twomey	Emails with FTI/Sidley team regarding go-forward debtor budget (.10); phone conference with M. Clemente regarding strategy (.30)	.40
02/11/21	MA Clemente	Call with D. Twomey re: strategy	.30
02/11/21	EA Bromagen	Review case calendar and revise, emails with R. Fink re same (.4); further review of same, emails with M. Clemente and A. Russell re same (.4) emails with P. Daugherty re hearing transcripts (.1) ; discuss various issues with G. Demo (.3)	1.20
02/15/21	MA Clemente	Team call with FTI re: various issues (.8) call with E. Bromagen re: various issues (.3)	1.10
02/15/21	DM Twomey	Review call agenda/emails (.10); weekly conference call with FTI/Sidley teams regarding case issues and next steps (.80)	.90
02/15/21	J Hoffman	Update case calendar (0.2); confer with Sidley team, Committee re: hearing transcripts (0.1); research re: same (0.2)	.50
02/15/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.80
02/15/21	EA Bromagen	Weekly call with FTI and Sidley teams re various issues (.8); call with M. Clemente re various issues (.3); call with G. Demo re various issues (.1); call with E. Cheng re various issues (.1); emails with J. Hoffman re scheduling (.1); discuss various issues with J. Fried (.2);	1.50
02/16/21	MA Clemente	Review case calendar (.2); call with E. Bromagen re: various issues (.3); call with J. Pomerantz re: various issues (.4)	.90
02/16/21	EA Bromagen	Call with M. Clemente re various issues (.3); emails with M. Hankin re scheduling (.1); review proceedings calendar and emails with R. Fink and M. Clemente re same (.3)	.70
02/17/21	R Fink	Revise and condense notes on weekly UCC meeting dated 2/17/21	.60
02/17/21	DJ Lutes	Emails from Sidley team regarding various case issues, deadlines and scheduling (.1); review materials for same (.2)	.30
02/17/21	DM Twomey	Review UCC call agenda, materials (.30); attend pre-call with	.80

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Date	Name	Narrative	Hours
		FTI/Sidley teams regarding UCC call topics, preparation (.50)	
02/17/21	T Nifong	Participate in standing Sidley/FTI team pre-UCC call	.50
02/17/21	MA Clemente	Call with FTI team to prepare for Committee meeting (.5); prepare for call with the Committee (.8); review draft agenda (.1)	1.40
02/17/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee call.	.50
02/18/21	J Hoffman	Update case calendar (0.1); correspondence with Sidley team re: hearing dates (0.1)	.20
02/18/21	EA Bromagen	Emails with M. Hankin re scheduling	.20
02/19/21	DJ Lutes	Prepare electronic files for Sidley team (.1); review docket and Sidley team emails for deadlines and updates (.1)	.20
02/19/21	J Hoffman	Confer with C. Rognes re: adversary proceeding trial order (.1); review documents in connection with same (.1)	.20
02/19/21	DM Twomey	Phone conference with M. Clemente regarding litigation trust issues, potential strategy	.40
02/19/21	MA Clemente	Call with D. Twomey re: various issues	.40
02/19/21	EA Bromagen	Emails with P. McVoy re scheduling	.10
02/21/21	J Hoffman	Update case calendar with new case information	.20
02/22/21	DJ Lutes	Prepare electronic files for Sidley team (.1); review calendar for hearings, depositions and deadlines (.1)	.20
02/22/21	J Hoffman	Correspondence with P. Montgomery re: hearing dates (0.1); correspondence with court re: hearing dates (0.2); confer with opposing counsel re: hearing dates (0.1); confer with Sidley team re: service requirements (0.2); correspondence with Z. Annable re: hearing information (0.1)	.70
02/22/21	DM Twomey	Weekly conference call with FTI/Sidley teams regarding case issues (.60); phone conference with M. Clemente regarding appeals, budget and other case issues (.30); emails with UCC, E. Bromagen regarding litigation schedule (.20); emails with UCC, team regarding confirmation order entry (.10); review order denying leave to appeal and related emails (.20)	1.40
02/22/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.60
02/22/21	MA Clemente	Team call with FTI re: various issues (.6); call with D. Twomey re: various issues (.3); email to team regarding appeals (.1)	1.00
02/23/21	DJ Lutes	Emails with B. Hillis of Highland regarding request for tax form (.1); prepare materials for same (.4)	.50

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Date	Name	Narrative	Hours
02/23/21	DM Twomey	Correspond with M. Clemente regarding hearing, status update	.20
02/23/21	J Hoffman	Correspondence with clerk re: summons issuance (0.2); confer with C. Rognes re: same (0.1); correspondence with Sidley team re: hearing instructions (0.1); correspondence with clerk re: hearing dates (0.1); complete transcript request form (0.1)	.60
02/23/21	MA Clemente	Email to Sidley team re: go forward issues (.2); email with Sidley team re: open issues (.2); emails with FTI re: D&O and other committee issues (.3)	.70
02/24/21	J Hoffman	Correspondence with KCC team re: service requirements	.10
02/25/21	J Hoffman	Confer with Sidley team re: notice procedures (0.3); review transcript from 1/26 hearing (0.1); update case calendar with new hearings (0.2); confer with FTI, KCC teams re: service requests (0.1)	.70
02/25/21	MA Clemente	Email with E. Bromagen re: board call (.1); call with J. Pomerantz re: various issues (.4); call with S. Starr re: various issues (.4)	.90
02/26/21	DJ Lutes	Prepare electronic materials for Sidley team (.3); emails with Sidley team regarding case developments and next steps (.2)	.50
02/26/21	J Hoffman	Confer with Sidley team re: scheduling order for adversary proceeding	.30
02/26/21	MA Clemente	Address J. Morris email re: fee shifting	.40
Task Subtotal			47.70
08 Claims Administration and Objections			
02/03/21	A Russell	Correspond with E. Bromagen and E. Cheng re settlement of Daugherty claim.	.20
02/09/21	PP Reid	Review materials regarding claim investigation (.3); emails and telephone conference with Sidley team regarding claim investigation (.3)	.60
02/10/21	J Hoffman	Review administrative expense claim applications (0.2); confer with A. Russell re: same (0.1)	.30
02/11/21	R Fink	Revise summary of pending adversary and appellate proceedings re: HCM	2.60
02/11/21	R Fink	Draft email to E. Bromagen regarding revisions to adversary and appellate schedule	.20
02/16/21	R Fink	Revise summary and schedule of pending adversary and appellate proceedings re: HCM	.60
02/17/21	R Fink	Revise summary and schedule of pending adversary and appellate proceedings re: HCM	.40

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Date	Name	Narrative	Hours
02/18/21	R Fink	Revise summary and schedule of pending adversary and appellate proceedings re: HCM (.3); draft email to E. Bromagen and E. Cheng re: same (.1)	.40
Task Subtotal			5.30
09 Corporate Governance and Board Matters			
02/01/21	TD Cunningham	Prepare for and participate in telephone conference with FTI re: various alternative D&O structures	1.10
02/05/21	PP Reid	Participate (in part) in Board call with UCC and advisors regarding confirmation and other case issues	.30
02/05/21	PH Montgomery	Call with Debtor board, UCC and advisors regarding confirmation and other case issues (.7); prepare for same (.3)	1.00
02/05/21	MA Clemente	Call with the Board/UCC and advisors regarding confirmation and other case issues (.7); prepare materials for same (.3)	1.00
02/05/21	A Russell	Telephone conference with Sidley team, FTI team, Pachulski, DSI, Committee and Independent Board members re weekly board update for Committee.	.70
02/05/21	EA Bromagen	Call with Board and UCC (.7); emails with FTI and UCC re plan projections and review of same (.3)	1.00
02/05/21	DM Twomey	Conference call with UCC/Board and advisors regarding confirmation and other case issues	.70
02/11/21	A Russell	Review correspondence re scheduling of Committee/ Board meeting 2/12.	.20
02/12/21	PH Montgomery	Attend board meeting call with professionals and Committee members regarding case updates	1.00
02/12/21	A Russell	Telephone conference with Sidley, FTI, DSI, Pachulski, Committee members and Independent Board re Board update for Committee.	1.00
02/12/21	PP Reid	Participate in board call with professionals and Committee members regarding report on Dondero (1.0); emails with Sidley and FTI teams regarding same (.2)	1.20
02/12/21	MA Clemente	Call with the Board regarding case issues, Dondero and next steps	1.00
02/12/21	EA Bromagen	Call with Board and Committee re various issues and Dondero proposal (1.0); review requests for information from insurers and develop response and compile responsive documents (.9)	1.90
02/15/21	TD Cunningham	Telephone conference with M. Flaharty (FTI) re: next steps	.10
02/15/21	TD Cunningham	Prepare for and participate in conference with FTI re: current status of HCM D&O search	.40

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02/15/21	EA Bromagen	Prepare and revise materials re response to insurer follow up questions (2.5); call with FTI team and Pachulski team re insurance search status (.2); emails with Pachulski team re same (.3) emails with FTI team re same (.2)	3.20
02/16/21	EA Bromagen	Drafting and revision of responses to D&O insurer requests for information (1.9); emails with FTI and Pachulski teams re same (.3)	2.20
02/17/21	EA Bromagen	Emails with Pachulski and FTI teams re response to D&O insurers	.30
02/19/21	EA Bromagen	Review of further inquiries and proposed responses from prospective insurers and emails with E. Cheng and M. Flaharty re same (.4); discuss same with E. Cheng and M. Flaharty (.3)	.70
02/22/21	EA Bromagen	Review and revise questions from insurers (.5); email to J. Pomerantz re same (.2)	.70
02/24/21	EA Bromagen	Emails with J. Pomerantz and FTI team re responses to insurers	.20
02/26/21	TD Cunningham	Review updated insurer queries and draft response thereto respecting HCM	.20
02/26/21	MA Clemente	Participate on call with the board regarding updates for committee	1.00
02/26/21	A Russell	Telephone conference with Sidley, FTI, Pachulski, DSI, Committee, and Independent Directors re Board update for Committee.	1.00
02/26/21	EA Bromagen	Call with Committee and Board re various issues	1.00
Task Subtotal			23.10
10 Employee Benefits and Pensions			
02/18/21	A Russell	Review, analyze update and correspondence re deferred compensation plan.	.40
Task Subtotal			.40
11 Retention			
02/10/21	TA Labuda	Conference with E. Bromagen re trustee retention issues	.20
02/15/21	MA Clemente	Address issues regarding retention of Kirschner	.40
02/16/21	EA Bromagen	Emails with Sidley team re Kirschner retention	.30
02/23/21	EA Bromagen	Draft Teneo retention application (2.1); emails with M. Clemente re same (.4); emails with M. Kirschner re same (.2)	2.70
02/24/21	MA Clemente	Address emails with E. Bromagen re: Kirschner retention (.3); review Kirschner revisions (.4)	.70
02/25/21	EA Bromagen	Review comments to Teneo retention application	.40

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Date	Name	Narrative	Hours
02/27/21	EA Bromagen	Emails with M. Kirchsner re Teneo retention application	.20
Task Subtotal			4.90
12 Fee Applications			
02/01/21	J Hoffman	Draft and file CNO for FTI fee application	.20
02/02/21	DJ Lutes	Prepare monthly fee application materials and exhibits (1.2); prepare spreadsheets for same (.7)	1.90
02/04/21	DJ Lutes	Prepare monthly fee application materials and exhibits (.6); prepare electronic files and spreadsheets for same (.4); emails with S. Caputo regarding monthly materials (.2)	1.20
02/05/21	DJ Lutes	Prepare monthly fee application (1.1); prepare interim fee application spreadsheet materials (.6)	1.70
02/08/21	DJ Lutes	Prepare monthly and interim fee application materials and exhibits	1.20
02/08/21	J Hoffman	Review, revise FTI fee application (0.5); draft email to committee re: same (0.1)	.60
02/09/21	DJ Lutes	Prepare monthly fee application materials and exhibits (1.0); research case status and background for same (.3)	1.30
02/10/21	DJ Lutes	Prepare monthly fee application (2.5); emails with S. Caputo regarding same (.1)	2.60
02/10/21	J Hoffman	Finalize and file FTI fee application	.20
02/11/21	DJ Lutes	Prepare monthly fee application materials and exhibits (5.8); emails with D. Peralta regarding same (.1); research biographical information for exhibits (.4)	6.30
02/12/21	DJ Lutes	Prepare monthly fee application materials and exhibits (5.8); call and email with S. Caputo regarding same (.3)	6.10
02/16/21	DJ Lutes	Prepare monthly fee application exhibits and materials	6.10
02/17/21	DJ Lutes	Prepare monthly fee application materials and exhibits (3.6); emails with S. Caputo regarding same (.2)	3.80
02/18/21	DJ Lutes	Prepare monthly fee application materials and exhibits	5.70
02/19/21	DJ Lutes	Prepare monthly fee application materials and exhibits (4.6); emails with S. Caputo regarding same (.2); emails with P. Foley regarding privilege (.1)	4.90
02/19/21	J Hoffman	Draft CNOs for fee applications (0.4); finalize and file same (0.2)	.60
02/19/21	MA Clemente	Review draft fee application	.50
02/22/21	DJ Lutes	Prepare monthly fee application materials and exhibits	2.90

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Date	Name	Narrative	Hours
02/23/21	DJ Lutes	Prepare monthly fee application exhibits and materials for February	2.10
02/24/21	DJ Lutes	Email with P. Foley regarding privilege review (.1); prepare monthly fee application materials for February (1.1); prepare monthly fee application materials for January (.6); review cost issues (.3)	2.10
02/25/21	DJ Lutes	Prepare February monthly fee application materials (1.5); prepare January fee application materials for M. Clemente (1.2); emails with P. Foley regarding same (.1); emails with S. Caputo regarding same (.2); email to M. Clemente and J. Hoffman regarding same (.1)	3.10
02/26/21	DJ Lutes	Emails with Sidley team regarding monthly fee application (.1); prepare monthly fee application for January and February (.4)	.50
02/26/21	J Hoffman	Review, revise Sidley fee application	.30
Task Subtotal			55.90
14 Litigation			
02/01/21	CM Rognes	Revise motion to preserve (0.9); revise proposed order re: motion to preserve (0.1); correspond with J. Hoffman re: motion to preserve (0.2); correspond with P. Montgomery re: motion to preserve (0.4); draft correspondence re: meet and confer for motion to preserve (0.2); correspond with P. Montgomery re: meet and confer (0.1); draft certificate of conference re: meet and confer (0.1); review response deadlines re: motion to preserve (0.1); confer with P. Reid, P. Montgomery, and T. Nifong re: Hunter Mountain Trust and litigation strategy (1.0); correspond with T. Nifong re: Hunter Mountain Trust chronology (0.1); review local rules re: service of motions (0.1); attend weekly professionals call with Sidley and FTI (1.0)	4.30
02/01/21	PH Montgomery	Call with FTI regarding confirmation issues (1.0); call with C. Rognes regarding motion (.4); call with C. Rognes, P. Reid and T. Nifong regarding transaction background (1.0); review cases related to preservation and review and revise motion to preserve (1.3); communications with Sidley team regarding motion filing, revisions to order and revisions to motion (.4); communications with J. Morris regarding document retention issues (.2); correspondence with A. Russell and others regarding affiliated entities and related research (1.0)	5.30
02/01/21	J Hoffman	Revise motion to compel preservation (0.2); correspondence with C. Rognes re: revisions to motion to compel (0.2)	.40
02/01/21	PP Reid	Telephone conference with FTI (1.0); email regarding depositions for contempt hearing (.2); emails regarding	3.40

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Date	Name	Narrative	Hours
		discovery of notes receivables (.3); emails regarding confirmation hearing (.9); telephone conference regarding Hunter mountain and request of Dondero's documents from non-debtor emails (1.0)	
02/01/21	T Nifong	Confer with P. Reid, P. Montgomery, and C. Rognes re: Hunter Mountain Transaction Chronology	1.00
02/01/21	T Nifong	Document review for discovery issues involving email accounts	2.40
02/01/21	M Abdul-Jabbar	Participate in professional call with Sidley litigation team and FTI regarding liquidation plan and related hearings (1.0); review related materials for same (.1)	1.10
02/01/21	NP Cade	Communication with C. Rognes regarding motion (.2); cite check and blue book Motion to Compel Preservation (1.1)	1.30
02/01/21	PG Foley	Weekly UCC professionals call with Sidley and FTI teams regarding confirmation issues (1.0); related correspondence with FTI and Sidley teams regarding same (.1)	1.10
02/02/21	CM Rognes	Review, analyze documents re: Hunter Mountain Trust (0.3); correspond with T. Nifong re: investigation (0.1); update task list (0.8)	1.20
02/02/21	A Russell	Correspond with Sidley team re status of contempt hearing.	.20
02/02/21	PH Montgomery	Attend confirmation hearing (7.0); call with C. Persons regarding same (.2)	7.20
02/02/21	PP Reid	Participated in confirmation hearing (7.0); emails and telephone conference(s) with Sidley and FTI teams regarding Dondero's new plan (.3); emails with Sidley team regarding witness lists (.3)	7.60
02/02/21	T Nifong	Review documents re: J. Dondero	6.20
02/02/21	T Nifong	Confer with M. Abdul-Jabbar re: Hunter Mountain Transaction	.40
02/02/21	M Abdul-Jabbar	Prepare for and confer with T. Nifong regarding Hunter Mountain adversary proceeding	.80
02/02/21	PG Foley	Attend confirmation hearing (in part)	2.20
02/03/21	PP Reid	Participate (in part) in confirmation hearing (6.6); call with P. Montgomery regarding discovery (.2); emails with Sidley team regarding Dondero proposal (.3)	7.10
02/03/21	T Nifong	Analyze documents re: possible J. Dondero personal email accounts	3.40
02/03/21	T Nifong	Research case law re: plan confirmation issues	2.00
02/03/21	CM Rognes	Research re: privilege (.1); revise investigation task list (.2); correspond with T. Nifong re: investigation (.1); correspond	.50

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Date	Name	Narrative	Hours
		with T. Nifong re: confirmation research (.1)	
02/03/21	PH Montgomery	Attend confirmation hearing and related tasks (7.5); call with P. Reid re discovery issues (.2)	7.70
02/03/21	J Hoffman	Attend (in part) confirmation hearing	4.70
02/04/21	T Nifong	Research case law re: plan confirmation issues	2.10
02/04/21	T Nifong	Confer with P. Montgomery re: document review	.30
02/04/21	CM Rognes	Correspond with P. Montgomery re: agenda for call with litigation trustee	.10
02/04/21	PP Reid	Emails with Sidley team regarding Dondero proposal	.20
02/04/21	PH Montgomery	Call with FTI regarding preparation for committee meeting (.9); call with T. Nifong regarding document review (.3); communications with P. McVoy regarding document review issues (.2); review of documents related to possible claims (2.8)	4.20
02/05/21	CM Rognes	Draft agenda re: call with litigation trustee (.1); review legal research re: confirmation issues (.2); review status of third party objector document review status (.1); correspond with P. Montgomery, E. Bromagen, A. Russell, FTI, and litigation trustee re: investigation (.5); review outstanding requests re: discovery and document preservation (.1)	1.00
02/05/21	T Nifong	Investigate documents re: discovery and Highland custodians	4.20
02/05/21	T Nifong	Investigate documents re: Hunter Mountain Transaction	1.40
02/05/21	T Nifong	Call (in part) with P. Montgomery and P. McVoy re: discovery	.30
02/05/21	PH Montgomery	Call with P. McVoy and T. Nifong regarding discovery	.40
02/05/21	PH Montgomery	Call (in part) with M. Kirschner, Sidley and FTI teams regarding confirmation and next steps regarding litigation trust	.30
02/05/21	PH Montgomery	Review of documents related to litigation trust (1.6); call with E. Bromagen regarding same (.5)	2.10
02/05/21	PH Montgomery	Review of documents related to upcoming hearings	1.10
02/05/21	EA Bromagen	Call with M. Kirschner, A. Russell, C. Rognes and P. Montgomery re litigation plan confirmation strategy (.5); call with P. Montgomery re same (.5)	1.00
02/08/21	PP Reid	Participate in court hearing (in part) on confirmation ruling (1.1); emails with Sidley and FTI teams regarding same (.2)	1.30
02/08/21	T Nifong	Investigate documents re: Hunter Mountain Transaction	5.50
02/08/21	CM Rognes	Attend weekly professionals call with Sidley and FTI regarding various issues	1.00
02/08/21	MA Clemente	Participate in plan ruling hearing	1.60

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Date	Name	Narrative	Hours
02/08/21	DM Twomey	Listen to confirmation ruling by Judge Jernigan (1.60); phone conference with M. Clemente regarding same, implementation issues, Dondero proposal (.50); analyze issues for same (.60); review Dondero status hearing request (.10); emails with team regarding same, proposed response (.10)	2.90
02/08/21	J Hoffman	Attend hearing for oral ruling on confirmation	1.60
02/08/21	PH Montgomery	Attend plan ruling hearing (1.6); review materials for same (.1)	1.70
02/08/21	A Russell	Correspond with Sidley team re updated litigation schedule and new depositions.	.20
02/08/21	M Abdul-Jabbar	Participate in professional call regarding claim confirmation and forthcoming adversary proceeding	1.00
02/09/21	T Nifong	Determine new search terms for discovery database	.60
02/09/21	CM Rognes	Correspond with P. Montgomery and Debtor's counsel re: document production and preservation (0.6); review list of outstanding requests (0.1); summarize outstanding requests with the Debtor (0.3); correspond with P. Montgomery re: search terms and next steps (0.3); correspond with e-discovery vendor re: privilege log (0.1); correspond with M. Abdul-Jabbar, P. Foley, and T. Nifong re: search terms (0.2)	1.60
02/09/21	MA Clemente	Call to M. Kirschner re: litigation trust (.1); email with P. Montgomery re: litigation (.1); strategy for retention of M. Kirshner (.4)	.60
02/09/21	PH Montgomery	Call with J. Morris and C. Rognes regarding data issues (.7); call with C. Rognes re discovery issues (.3)	1.00
02/09/21	PG Foley	Correspondence with M. Abdul-Jabbar, T. Nifong and C. Rognes regarding investigation search terms	.60
02/09/21	EA Bromagen	Research direct appeal process (1.3); emails with J. Hoffman re appeals process (.2); review of research re same (.3)	1.80
02/10/21	R Fink	Draft summary of pending adversary and appellate proceedings re: HCM	2.20
02/10/21	R Fink	Draft emails to E. Bromagen re- summary of HCM adversary and appellate proceedings	.20
02/10/21	T Nifong	Investigate documents re: Hunter Mountain Transaction and litigation issues	1.70
02/10/21	T Nifong	Investigate documents re: Hunter Mountain Transaction and documents claimed privileged	2.80
02/10/21	T Nifong	Participate in standing Pre-UCC call with Sidley and FTI teams	.50
02/10/21	CM Rognes	Draft search terms (1.2); correspond with T. Nifong re: search terms (0.1); correspond with Meta-E re: analytics (0.2);	2.00

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Date	Name	Narrative	Hours
		correspond with P. Montgomery re: analytics (0.5)	
02/10/21	PP Reid	Participate in professional call (.5); emails with Sidley/FTI teams regarding cash flow projections and Dondero's proposal (.3); analyze litigation issues regarding Kirschner (.5); telephone conference with P. Montgomery and M. Clemente regarding litigation claims (.5); emails regarding contempt hearing (.3); emails with Sidlley team regarding privilege issues (.1)	2.20
02/10/21	PH Montgomery	Call with FTI regarding UCC call (.5); call with P. Reid and M. Clemente re strategy issues (.5); correspond with C. Rognes regarding search term follow ups and additional custodial requests (.5)	1.50
02/10/21	MA Clemente	Call with P. Reid and P. Montgomery re: litigation strategy	.50
02/10/21	M Abdul-Jabbar	Review Relativity files and potential claims of the estate in connection with adversary proceeding and discovery related thereto	1.00
02/10/21	PG Foley	Attend UCC professionals call (.5); review related correspondence from Sidley and FTI teams regarding same (.2)	.70
02/10/21	EA Bromagen	Review of adversary proceeding dockets and discuss scheduling of litigation with R. Fink (.5); emails with R. Fink re same (.1)	.60
02/11/21	CM Rognes	Draft search terms (0.5); correspond with third party objectors re: document review status (0.2); correspond with debtor's counsel re: search terms (0.1); correspond with T. Nifong re: Hunter Mountain (0.1)	.90
02/11/21	T Nifong	Investigate documents and assemble timeline re: Hunter Mountain Transaction	4.10
02/11/21	PP Reid	Assess privilege issues and privilege log (.2); analyze Dondero's proposal (.2); emails with debtor's counsel regarding preserving debtor's employees' hard drives (.3)	.70
02/11/21	MA Clemente	Email with litigation team regarding contempt hearing (.1); call with M. Kirschner re: various issues (.4); email with litigation team re: call with M. Kirschner (.1)	.60
02/11/21	A Russell	Review, analyze Dondero motion to continue contempt hearing and Court's order granting same (.3); correspond with Sidley team re update in schedule re same (.1); review, analyze new deposition notices (.2); correspond with Sidley team re updated litigation schedule and schedule of adversary proceedings (.3).	.90
02/11/21	M Abdul-Jabbar	Propose search terms in connection with discovery requests	.30
02/11/21	EA Bromagen	Review research re potential timeline of confirmation appeals (.4); emails with J. Hoffman re same (.1)	.50

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Date	Name	Narrative	Hours
02/12/21	T Nifong	Investigate documents re: Debtor employees	3.50
02/12/21	T Nifong	Investigate documents re: Hunter Mountain Transaction	4.20
02/12/21	CM Rognes	Revise select document chronology (0.5); correspond with T. Nifong re: select document chronology (0.4)	.90
02/12/21	PH Montgomery	Review of documents related to newly identified email addresses and related correspondence with J. Morris	1.40
02/12/21	PP Reid	Emails Sidley and FTI teams regarding litigation trust claims	.20
02/15/21	PP Reid	Participate in telephone conference with FTI (in part) regarding case issues (.7); participate in Leventon Deposition (4.5)	5.20
02/15/21	PH Montgomery	Attend I. Leventon deposition (4.5); prepare for same (.2)	4.70
02/15/21	MA Clemente	Participate in Leventon deposition (in part)	2.10
02/15/21	CM Rognes	Attend weekly professionals call with Sidley and FTI teams (in part) regarding various case issues	.70
02/15/21	T Nifong	Investigate documents regarding Hunter Mountain transaction	3.20
02/15/21	PH Montgomery	Review and revise litigation trust agreement and confirmation order and related Sidley team correspondence regarding same	1.30
02/15/21	A Russell	Attend virtual deposition of I. Leventon re Dondero contempt motion.	4.50
02/16/21	T Nifong	Investigate documents re: Hunter Mountain Transaction and litigation issues	4.80
02/16/21	PP Reid	Participate in deposition of Ellington deposition (in part) (3.2); emails with Sidley team regarding litigation trustee (.2); emails with Sidley team regarding appellate timeline (.2); emails with Sidley team regarding confirmation order (.1); review FTI Debtor's plan to HCLOF plan (.2)	3.90
02/16/21	MA Clemente	Participate in Leventon deposition (2.0); address retention issues for Kirschner (.4); review issues regarding HCLOF and potential structures (.4); email with E. Bromagen re: FTI analysis (.1); address issues regarding privilege, confirmation order and related issues (.4); emails with A. Russell re: privilege and confirmation order (.2)	3.50
02/16/21	B Kirchoff	Research analytics for J. Hoffman on appeals to U.S. District Court	1.50
02/16/21	PH Montgomery	Attend and participate in deposition of S. Ellington (4.0); communications regarding revisions to confirmation order (.4); communications with J. Morris regarding privilege issues (.2); review of documents related to deposition issues (1.3)	5.90
02/16/21	A Russell	Attend deposition of S. Ellington (in part) regarding Dondero	3.10

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Date	Name	Narrative	Hours
		contempt motion.	
02/16/21	DM Twomey	Emails with FTI regarding HCLOF deal (.20); review related materials (.20)	.40
02/17/21	CM Rognes	Draft chronology re: Hunter Mountain (0.5); review status of review re: third party objectors (0.2)	.70
02/17/21	CM Rognes	Attend pre-UCC call with Sidley and FTI teams (in part)	.40
02/17/21	PG Foley	Attend UCC professionals call with Sidley and FTI teams regarding preparation for UCC call	.50
02/17/21	T Nifong	Revise Hunter Mountain Transaction Chronology	3.70
02/17/21	PP Reid	Participate in professional call with Sidley and FTI teams regarding UCC call (.5); emails with professionals regarding litigation trustee assistance (.5); emails with team and Debtor counsel regarding discovery outstanding (.5)	1.50
02/17/21	MA Clemente	Read Leventon transcript (.5); read new lawsuit against Nexpoint (.5); finalize review of appeal timeline (.3); address M. Kirschner emails (.2)	1.50
02/17/21	PH Montgomery	Call with FTI and Sidley teams regarding UCC meeting (.5); review of materials related to claims (.9)	1.40
02/17/21	A Russell	Review, analyze illustrative appellate timeline re potential confirmation order appeal (.6); correspond with Sidley team re objection to examiner motion (.2).	.80
02/17/21	EA Bromagen	Review Debtor compliant against NexPoint	.40
02/18/21	CM Rognes	Correspond with T. Nifong re: Hunter Mountain chronology (0.1); call with P. Montgomery and Debtor's counsel re: outstanding investigation requests and document preservation (0.5); draft list of outstanding investigation requests (0.5); correspond with P. Montgomery re: search terms (0.1)	1.20
02/18/21	T Nifong	Prepare Hunter Mountain Chronology	1.80
02/18/21	PP Reid	Emails with FTI regarding employee hard drive download (.2); emails with FTI and Sidley teams regarding collectability of outstanding notes receivable (.2)	.40
02/18/21	MA Clemente	Review Ellington transcript (1.0); address examiner objection and timing (.3); email with E. Bromagen re: examiner response (.1); email with J. Pomerantz re: extension (.1); review stipulation (.1)	1.60
02/18/21	PH Montgomery	Communications with J. Morris regarding document retention issues (.4); call with C. Rognes regarding status of document review (.5)	.90
02/18/21	EA Bromagen	Emails with M. Clemente, D. Draper, G. Demo, re filing of	.60

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Date	Name	Narrative	Hours
		response to examiner motion (.4); review stipulation re examiner motion and emails with M. Clemente re same (.2)	
02/19/21	R Fink	Revise summary and schedule of pending adversary and appellate proceedings re: HCM (.2); draft email to E. Bromagen and E. Cheng re: same (.1)	.30
02/19/21	PP Reid	Telephone conference (in part) with M. Clemente and P. Montgomery regarding litigation trustee privilege and assistance	.50
02/19/21	CM Rognes	Review discovery rules (0.4); correspond with J. Hoffman re: discovery (0.1)	.50
02/19/21	CM Rognes	Research re: privilege stipulation (0.1); review list of outstanding discovery issues (0.2); review note adversary proceedings (0.7); correspond with FTI re: data preservation (0.1)	1.10
02/19/21	MA Clemente	Call with P. Montgomery and P. Reid (in part) re: litigation strategy (1.1); call with M. Kirschner re: various issues (.4); analysis of note receivable actions and strategy (.6)	2.10
02/19/21	PG Foley	Review of January invoice (3.1); related correspondence with Sidley team regarding same (.2)	3.30
02/19/21	PH Montgomery	Call with M. Clemente and P. Reid (in part) regarding strategy issues (1.1); emails with C. Rognes, M. Clemente and P. Reid regarding document preservation issues (.3)	1.40
02/21/21	J Hoffman	Advise Sidley team of motion requirements	.10
02/22/21	R Fink	Revise summary and schedule of pending adversary and appellate proceedings re: HCM (.3); draft emails to E. Bromagen and FTI re-same (.1)	.40
02/22/21	CM Rognes	Research re: service of process (0.4); correspond with P. Montgomery re: service of process (0.1); correspond with opposing counsel re: service of process (0.2)	.70
02/22/21	CM Rognes	Attend weekly professionals call with Sidley and FTI regarding various case issues (0.6); review, revise list of outstanding discovery requests (0.3); correspond with Debtor's counsel re: outstanding discovery requests (0.2)	1.10
02/22/21	T Nifong	Prepare Hunter Mountain Transaction Chronology (3.5); emails with N. Cade regarding same (.1)	3.60
02/22/21	J Hoffman	Draft notices of appearance (0.3); research AP notice requirements (0.3); correspondence with opposing counsel re: proposed order revisions (0.1); confer with Sidley team re: deposition notices (0.4); confer with Sidley team re: PI motion (0.3); research re: same (0.2); review order denying appeal motion (0.2)	1.80

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Date	Name	Narrative	Hours
02/22/21	PG Foley	Weekly UCC professionals call with Sidley and FTI teams regarding various case issues	.60
02/22/21	PP Reid	Telephone conference with Sidley and FTI teams regarding outstanding issues on plan and litigation (.6); participate in deposition of Dustin Norris (1.7); participate in deposition of Dondero for contempt hearing (1.2)	3.50
02/22/21	NP Cade	Communication with T. Nifong regarding document project (.1); prepare electronic chronology of documents cited in Hunter Mountain Chronology (.3); prepare revisions to same (.1)	.50
02/22/21	PH Montgomery	All with Sidley and FTI teams regarding status (.6); attend D. Norris deposition (1.7); attend J. Dondero deposition (1.2); communications with Dondero counsel re extension to deadline to respond to motion for preservation (.2); communications with C. Rognes regarding preservation issues (.3); review of timeline from T. Nifong regarding preservation (.2); communications regarding service for adversary proceeding (.4); review of documents related to deposition issues (1.4)	6.00
02/22/21	A Russell	Attend deposition of D. Norris re mandatory injunction adversary (1.7); attend deposition of J. Dondero re same (1.2); correspond with Sidley team re depositions (.3); review, analyze transcript of J. Seery deposition re mandatory injunction adversary (1.1); review correspondence re Dondero request to move contempt hearing (.2); review, analyze Dondero objection to Debtor's motion to find J. Dondero in contempt of TRO (.8); review, analyze Dondero motion to exclude evidence re same (.4); correspond with Sidley team re objection to examiner motion (.2)	5.90
02/22/21	MA Clemente	Participate in Dondero deposition (1.2); read Seery deposition transcript (.7); participate in Norris deposition (in part) (1.0); emails with A. Russell re: examiner objection (.2); review pleadings for emergency hearing (.6); address notice regarding preliminary injunction (.1); email with P. Montgomery re: notice (.1); address examiner motion strategy (.4)	4.30
02/22/21	EA Bromagen	Research re objection to examiner motion (1.5); draft objection to examiner motion (2.1); emails to A. Russell and M. Clemente re same (.2)	3.80
02/23/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
02/23/21	CM Rognes	Attend contempt hearing (in part)	.60
02/23/21	CM Rognes	Research re: privilege stipulation (0.2); research re: service (2.7); correspond with T. Nifong re: stipulation (0.2)	3.10

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Date	Name	Narrative	Hours
02/23/21	J Hoffman	Attend (in part) hearing on motion for PI (2.7); confer with C. Rognes re: service requirements (0.3); research regarding same (0.4); analyze federal, local rules in connection with AP pleadings (0.2); draft notice of hearing (0.2); analyze summons and related requirements (0.2)	4.00
02/23/21	PP Reid	Participate in hearing (in part) on advisor's injunction motion	6.20
02/23/21	NP Cade	Communication with T. Nifong regarding documents (.1); prepare electronic chronology of documents cited in Hunter Mountain Chronology (1.4); revisions to same (.3)	1.80
02/23/21	PH Montgomery	Attend hearing (in part) on motion for injunction (5.6); communications with Sidley team re service for adversary proceedings (.2); communications with J. Morris regarding data preservation issues (.2)	6.00
02/23/21	MA Clemente	Participate in declaratory judgment action (7.4); revisions to examiner motion (.8); revisions to further draft examiner motion (.4); emails with E. Bromagen re: examiner motion (.3)	8.90
02/23/21	A Russell	Attend adversary proceeding hearing re mandatory injunction including analysis of related pleadings (7.4); review, comment on examiner objection (.7); correspond with Sidley team re same (.2).	8.30
02/23/21	EA Bromagen	Attend hearing on emergency injunction (4.0); attend hearing on emergency injunction (cont'd) (2.3); revise examiner motion (.5); emails with A. Russell and M. Clemente re same (.4); further revisions to same (.6)	7.80
02/24/21	CM Rognes	Research re: service (1.1); call with J. Hoffman regarding jurisdiction issues (.1); correspond with M. Abdul-Jabbar re: service requirements (.1)	1.30
02/24/21	J Hoffman	Research service requirements for foreign entities (0.8); correspondence with C. Rognes re: same (0.1); call with C. Rognes to discuss jurisdiction issues (0.1); advise FTI team on plan supplement schedules (0.5); finalize notice of hearing for filing (0.2); correspondence with defendants re: service inquiries (0.1)	1.80
02/24/21	T Nifong	Draft Stipulation Granting Privilege Access to UCC and Trustee in Advance of Effective Date	3.90
02/24/21	NP Cade	Communications with C. Rognes regarding service (.1); coordination with First Legal Process Servers to serve Revised Summons (.4); prepare materials and package to be sent via US Mail (per rules) to Grant Scott (.6)	1.10
02/24/21	MA Clemente	Respond to email from the clerk re: examiner motion (.1); email with E. Bromagen re: examiner motion (.1); address litigation trust budget and funding (.4)	.60

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Restructuring

Date	Name	Narrative	Hours
02/24/21	A Russell	Review, analyze Debtor objection to Dondero motion to strike evidence re contempt hearing.	.20
02/24/21	C Clark	Assemble and electronically file Notice of Hearing (.4); online research through the TX Secretary of State for CLO Holdco, Ltd (.4)	.80
02/24/21	EA Bromagen	Emails with M. Clemente re Kirschner retention (.2); emails with litigation team re plan supplement documents re privilege stipulation (.3)	.50
02/25/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
02/25/21	CM Rognes	Revise privilege stipulation (0.8); correspond with T. Nifong re: privilege stipulation (0.2); research re: service on foreign entities (0.7); review status of third party objector document review (0.1)	1.80
02/25/21	T Nifong	Draft stipulation granting UCC and trustee privilege	4.40
02/25/21	J Hoffman	Draft notices of appearance (0.6); research re: same (0.2); confer with C. Rognes re: service of summons (0.3); research Hague Convention requirements (0.3)	1.40
02/25/21	M Abdul-Jabbar	Analyze bankruptcy rules of procedure in connection with pending adversary filing against CLO Holdco and related parties	.60
02/25/21	PH Montgomery	Communications with Sidley team regarding document preservation, production, and review (.8); correspondence with Sidley team related to service for adversary proceeding (.8)	1.60
02/25/21	PH Montgomery	Communications with objectors regarding document production	.20
02/25/21	MA Clemente	Emails with E. Bromagen re: examiner motion	.30
02/25/21	A Russell	Review, analyze court's correspondence re examiner motion.	.20
02/25/21	EA Bromagen	Emails with A. Russell and G. Demo re examiner motion	.20
02/26/21	T Nifong	Draft stipulation granting Debtor privilege in advance of effective date	1.60
02/26/21	CM Rognes	Revise stipulation re: privilege (0.4); research re: service (0.2)	.60
02/26/21	J Hoffman	Draft analysis of jurisdiction, service issues in connection with adversary proceeding (0.3); research regarding 7004 issues (0.2)	.50
02/26/21	NP Cade	Communication with C. Rognes (.1); prepare revised summons package to corrected address of Grant Scott in Colorado (.5)	.60
02/26/21	NP Cade	Prepare electronic chronology of documents cited in Hunter	1.90

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Date	Name	Narrative	Hours
		Mountain Chronology (1.6); revisions to same (.3)	
02/26/21	PH Montgomery	Attend board call (in part) regarding case issues and updates for the committee (.5); correspondence regarding adversary service (.5); communications regarding stipulation regarding documents (.1)	1.10
02/26/21	EA Bromagen	Review of draft privilege stipulation (.6); emails with T. Nifong re same (.2)	.80
02/27/21	R Fink	Revise summary and schedule of pending adversary and appellate proceedings re: HCM	.10
02/28/21	CM Rognes	Review Dondero's revisions to proposed preservation order (0.2); correspond with P. Montgomery re: preservation order (0.1)	.30
02/28/21	MA Clemente	Address email and request from J. Morris re: contempt hearing (.2); emails with P. Montgomery and P. Reid re: contempt hearing (.2)	.40
Task Subtotal			326.90
15 Plan and Disclosure Statement			
02/01/21	DJ Lutes	Review emails with Sidley team to assist regarding confirmation hearing issues, filings and related case developments	.30
02/01/21	DM Twomey	Phone conference with M. Clemente regarding confirmation preparation, related updates/issues (.30); review Dondero trusts' supplemental confirmation objection (.20); emails with team regarding same, response (.20); phone conference with M. Clemente regarding same, confirmation opening argument (.60); review/revise draft response to supplemental confirmation objection (1.10); analyze related issues (.30); emails with team regarding final revisions, filing (.20)	2.90
02/01/21	A Russell	Review, analyze Dugaboy supplemental objection to confirmation (.9); correspond with Sidley and Pachulski teams re same (.2); draft, revise and finalize Committee's reply to Dugaboy supplemental objection (3.7); correspond with Sidley, Pachulski and Committee re same (.4); update confirmation objection chart re status of resolution (.6).	5.80
02/01/21	J Hoffman	Research re: post-confirmation issues (0.3); review, revise committee response to objection to confirmation (0.3); finalize and file response (0.2)	.80
02/01/21	MA Clemente	Analysis of emails regarding D&O structuring (.5); numerous emails with A. Russell re: supplemental objection and response (.4); call with D. Twomey re: hearing strategy (.6); call with J. Pomerantz re: hearing strategy (.3); read supplemental objection (.4); revise response to supplemental objection (.8);	7.20

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Date	Name	Narrative	Hours
		further revisions to response to supplemental objection (.4); address FTI emails re: D&O structuring (.3); email from Tom Cunningham re: update on call with FTI (.1); prepare for confirmation hearing (3.1); call with D. Twomey regarding same (.3)	
02/01/21	EA Bromagen	Call with FTI and Sidley team re confirmation hearing (1.0); preparation for same (.5); emails with Committee re updates and plan projections (.3); emails with M. Clemente re plan confirmation filings (.2); emails with G. Demo and A. Russell re Debtor additional plan filings (.2); review revised filed plan projections (.3); research case law re supplemental plan objection (1.1); review hearing transcripts and emails with M. Clemente, A. Russell, D. Twomey re same (.2); emails with A. Russell, J. Hoffman, and Committee re filing of reply to supplemental objection (.3)	4.10
02/02/21	DJ Lutes	Review confirmation hearing developments for next steps, timing and deadlines (.1); emails with Sidley team regarding same (.1)	.20
02/02/21	CM Rognes	Attend confirmation hearing (in part)	1.00
02/02/21	DM Twomey	Review new projections/plan supplement, other recent filings (.40); listen to confirmation hearing (in part) (5.50); emails with team regarding confirmation-related questions (.30); emails with team regarding updated Dondero plan proposal (.30); phone conference with M. Clemente regarding updated Dondero plan proposal, insurance issues, related strategy and next steps (.50); analyze related issues (.20)	7.20
02/02/21	A Russell	Attend confirmation hearing (7.0); prepare for hearing (.2); correspond with Sidley and FTI teams re same, updated Dondero proposals, requests for continuance of confirmation (.7); correspond with A. Attarwala and E. Bromagen re confirmation hearing developments (.3)	8.20
02/02/21	J Hoffman	Attend (in part) plan confirmation hearing	4.60
02/02/21	MA Clemente	Prepare for confirmation hearing (2.5); participate in confirmation hearing (7.0); study revised proposal from Dondero (.8); call with J. Pomerantz re: revised proposal (.2); correspondence from Dondero re: revised proposal (.2)	10.70
02/02/21	EA Bromagen	Analyze final voting report and emails with M. Clemente re same (.5); attend confirmation hearing (7.0); emails with M Clemente re plan injunction (.3)	7.80
02/03/21	A Russell	Attend confirmation hearing (in part) (6.0); review, analyze NexPoint/Dondero term sheet and correspondence (.9); correspond with Sidley and FTI teams re same, counterproposal considerations (.6); review, analyze updated	7.80

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Restructuring

Date	Name	Narrative	Hours
		voting report and correspond with E. Bromagen re same (.1); correspond with E. Cheng re Debtor's statement during confirmation re resolution of tax parties' confirmation objections (.2)	
02/03/21	DJ Lutes	Review updated electronic filings and Sidley team correspondence for confirmation deadlines, background and timing.	.20
02/03/21	CM Rognes	Attend confirmation hearing (in part)	1.00
02/03/21	DM Twomey	Phone conference with M. Clemente regarding revised Dondero plan offer (.30); review Dondero offer/materials and analyze related issues (.50); correspond with M. Clemente regarding closing argument preparation (.10); listen to confirmation hearing (part) (4.80); post-call with M. Clemente regarding hearing, Dondero proposal and related strategy, next steps (.40)	6.10
02/03/21	J Hoffman	Review proposal from D. Rukavina re: competing plan	.20
02/03/21	MA Clemente	Prepare for confirmation hearing (1.2); call with J. Pomerantz re: Dondero proposal (.2); call with J. Seery re: Plan (.2); assess Dondero proposal and response (.5); call with D. Twomey re: strategy (.3); participate in confirmation hearing (7.5); analyze Dondero termsheet and revised plan (.4); post hearing call with D. Twomey regarding strategies (.4)	10.70
02/03/21	EA Bromagen	Attend confirmation hearing (1.9); attend confirmation hearing (continued) (4.6); consider Dondero proposal, review of competing plan (1.0); email to M. Clemente re potential counter proposal provisions (.3)	7.80
02/04/21	MA Clemente	Call with J. Pomerantz re: Dondero plan (.3); analysis of Dondero plan and proposal (1.2); call with D. Twomey regarding same (.3); evaluate D&O insurance issues (.5); analysis of recovery scenarios and potential settlement structures (.8)	3.10
02/04/21	A Russell	Review, analyze ongoing updates and correspondence re Dondero's plan proposal.	.60
02/04/21	EA Bromagen	Call with Sidley and FTI teams re competing plan proposal (.9); emails with FTI and Committee re competing plan analysis (.3)	1.20
02/04/21	DM Twomey	Phone conference with M. Clemente regarding plan issues (.30); emails with team regarding Dondero proposal questions (.20)	.50
02/05/21	TD Cunningham	Prepare for and participate in telephone conference with M. Flaharty (FTI), C. Tully (FTI) and G. Vicidomino (Alliant) re: status of research into alternative structures for D&O insurance	.60

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Date	Name	Narrative	Hours
		and next steps (0.5); review email from E. Cheng (FTI) re: additional information to share with Alliant (0.1)	
02/05/21	DM Twomey	Emails with FTI regarding plan comparison materials and review same (.20); emails with team regarding employee issue (.10); phone conference with M. Clemente regarding confirmation issues, Dondero proposal, next steps (.40)	.70
02/05/21	MA Clemente	Call with FTI re: D&O issues (.5); continued analysis of Dondero proposal and related strategy (2.1); call with D. Twomey regarding same (.4)	3.00
02/05/21	A Russell	Telephone conference with M. Kirschner, Sidley team and FTI team re status of confirmation, next steps re litigation trust (.5); review, analyze updated comparison analysis of Dondero's plan proposal and the filed plan (.3); correspond with FTI re same (.1).	.90
02/07/21	MA Clemente	Address D&O information requests and email from FTI	.30
02/07/21	EA Bromagen	Emails with G. Demo re plan documents	.10
02/08/21	DJ Lutes	Review plan confirmation materials for timing, developments and next steps (.3); emails with Sidley team regarding same (.1)	.40
02/08/21	IC Ferrell	Research re 5th Circuit's perspective and precedent on litigation issue.	4.80
02/08/21	CM Rognes	Attend confirmation ruling hearing (in part)	1.20
02/08/21	MA Clemente	Address D&O insurance issues (.4); assess appellate risk and strategy (.6); address motion for status conference by Dondero (.3); call with J. Pomerantz re: Dondero motion (.2); emails with Judge Jernigan clerk regarding case issues (.2)	1.70
02/08/21	TD Cunningham	Prepare for and participate in telephone conference with Alliant and FTI re: potential alternative risk transfer structures for HCM risk	.80
02/08/21	TD Cunningham	Prepare materials re: Alliant/FTI call	.10
02/08/21	A Russell	Attend bench ruling re confirmation (1.6); correspond with Sidley, FTI, and Committee members re follow up from same (.3); review, analyze Dondero request for status conference (.1); correspond with Sidley team re same, correspondence from Dondero's counsel re plan proposal and Committee counter (.4).	2.40
02/08/21	EA Bromagen	Listen to ruling on confirmation (1.6); review Dondero filings and emails with team re same (.2)	1.80
02/09/21	IC Ferrell	Analyzed case law, treatises, and journals re confirmation issues and its application in the 5th Cir. (2.9); prepare summary	4.00

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Date	Name	Narrative	Hours
		of findings (1.1)	
02/09/21	MA Clemente	Emails from Dondero re: pot plan (.2); call with D. Twomey re: pot plan and related issues (.5); address D&O insurance issues (.4); assess post confirmation pre-effective date strategy (.7); evaluate analytical email from A. Russell re: interim distributions (.5)	2.30
02/09/21	DM Twomey	Phone conference with M. Clemente regarding pre-effective date issues, Dondero proposal, related strategy	.50
02/09/21	J Hoffman	Research re: Fifth Circuit precedent on post-confirmation issues	2.10
02/09/21	A Russell	Review, analyze research re pre-effective date distributions (.9); draft summary of analysis re same (2.4); correspond with Sidley team re same (.2)	3.50
02/09/21	R Schulman	Research re: Fifth Circuit precedent on confirmation issues.	1.20
02/09/21	EA Bromagen	Discuss monetization timeline with E. Cheng (.5); review of FTI monetization timeline and emails with E. Cheng re same (.6)	1.10
02/10/21	J Hoffman	Research re: SJG opinions in connection with plan confirmation	.20
02/10/21	MA Clemente	Assess possible responses to Dondero (.5); work on strawman proposal (.8); analysis of FTI's deck on monetization (.4); call with D. Twomey re: strategy re: response (.4); review update on D&O issues (.3)	2.40
02/10/21	DM Twomey	Emails with FTI/Sidley teams regarding potential response to Dondero proposal, related questions/information (.40); phone conference with M. Clemente regarding plan implementation issues, steps and Dondero proposal (.40)	.80
02/10/21	EA Bromagen	Review of FTI monetization schedule (.3); emails with M. Clemente re response to Dondero re proposal (.2)	.50
02/11/21	J Hoffman	Correspondence with E. Bromagen re: confirmation research write-up	.10
02/11/21	MA Clemente	Assess email from M. Lynn (.2); work on email response to Dondero proposal (.5); call with J. Pomerantz re: various issues (.3); strategy regarding Dondero developments and response (.9)	1.90
02/11/21	A Russell	Review, analyze draft counter proposal to Dondero re plan.	.40
02/11/21	DM Twomey	Emails with M. Clemente regarding counter proposal to Dondero, related issues/strategy (.20); emails with UCC, M. Clemente regarding same (.10)	.30
02/11/21	EA Bromagen	Emails with M. Clemente re Dondero proposal (.2); review of	.50

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Restructuring

Date	Name	Narrative	Hours
		prior correspondence between M. Clemente and Lynn re Dondero proposal (.3)	
02/12/21	DJ Lutes	Review case updates, deadlines and plan issues (.2); emails with Sidley team regarding same (.1)	.30
02/12/21	DM Twomey	Correspond with M. Clemente regarding upcoming UCC call, related issues (.10); emails with team regarding Dondero plan questions, releases (.30); phone conference with M. Clemente regarding calls with UCC members, related questions, next steps (.30); emails with M. Clemente regarding Dondero counter and response (.10)	.80
02/12/21	MA Clemente	Work on Kirschner retention issues (.8); address strategy with Dondero (.7); call with D. Twomey regarding same (.3); finalize response to Dondero (.4); review prior correspondence with J. Lynn (.4); assess information from the Board and impact on Committee (.4)	3.00
02/12/21	A Russell	Correspond with Sidley, FTI, and Committee members re revisions to Dondero counter proposal following Board discussion (.4); review, analyze revised Committee proposal and status of proposed releases in connection with prior proposals (.6); correspond with Sidley team re same (.3); review, analyze Dondero response to Committee counterproposal re Plan (.2).	1.50
02/12/21	J Hoffman	Research re: appellate timeline (2.1); draft appellate timeline (0.8)	2.90
02/12/21	EA Bromagen	Analyze Dondero proposal and emails with A. Russell and M. Clemente re release of claims issue	.70
02/14/21	MA Clemente	Email regarding findings of fact (.1); brief initial review of findings of fact (.5)	.60
02/14/21	EA Bromagen	Review proposed Confirmation Order (.5); review of potential appeals time line and emails with J. Hoffman re same (.4)	.90
02/15/21	MA Clemente	Read and provide comments on confirmation order (2.7); detailed email to A. Russell and E. Bromagen re: comments to plan and confirmation order (.3); review comments from L&W (.4); respond to Sidley emails regarding privileges and confirmation order (.4); review appeal timeline and issues (.3)	4.10
02/15/21	J Hoffman	Revise appellate timeline (1.8); correspondence with Sidley team re: same (0.3)	2.10
02/15/21	A Russell	Review, comment on confirmation order.	2.10
02/15/21	DM Twomey	Review appeal timeline and related emails	.20
02/15/21	EA Bromagen	Further review of projected confirmation appeals timeline and emails with J. Hoffman re same (.5); emails with P.	.60

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Date	Name	Narrative	Hours
		Montgomery re litigation trust agreement (.1)	
02/16/21	J Hoffman	Correspondence with Sidley team re: appellate timeline (.2); revise timeline with Sidley comments (.6); review rules in connection with appellate timeline (1.4)	2.20
02/16/21	DM Twomey	Emails with team regarding appeal timeline and review same (.20); review draft confirmation order (1.30); emails with team regarding confirmation order revisions (.20); correspond with M. Clemente regarding case issues (.30)	2.00
02/16/21	MA Clemente	Further review of confirmation order (1.1); emails to the Sidley team re: revisions to confirmation order (.3); assess retained causes of action (.3); revisions to appellate timeline and analysis (.5); email with Sidley team re: revisions (.1); review further revisions to confirmation order (.4)	2.70
02/16/21	A Russell	Review, comment on confirmation order (5.4); correspond with Sidley and FTI teams re same (.6); review, analyze Sidley, FTI and committee member comments re same (.8); correspond with Pachulski team re revised confirmation order (.1)	6.90
02/16/21	EA Bromagen	Review of appeals timeline and emails with J. Hoffman re same (.4); review of confirmation order revisions (.6); emails with Sidley team re same (.3); further review and revision of confirmation order language and emails with Sidley team re same (1.0); review of CLO issuers settlement and emails with A. Russell re same (.3)	2.60
02/17/21	J Hoffman	Revise timeline for appeal	.80
02/17/21	MA Clemente	Further review of confirmation order	1.20
02/17/21	A Russell	Review, analyze revised confirmation order (.9); correspond with Sidley and Pachulski re same (.2).	1.10
02/17/21	EA Bromagen	Review and revise illustrative appeals timeline (.6); emails with J. Hoffman re same (.1)	.70
02/18/21	DM Twomey	Emails with M. Clemente, UCC regarding deferred comp plan, related proposal (.20); phone conference with M. Clemente regarding same, litigation trust and plan implementation issues (.20)	.40
02/18/21	MA Clemente	Further review of confirmation order and revisions thereto (.8); call with D. Twomey regarding same (.2)	1.00
02/18/21	A Russell	Correspond with Sidley team re objection to examiner motion.	.30
02/18/21	EA Bromagen	Further review of revisions to confirmation order (.4); email to Committee re same (.1)	.50
02/19/21	MA Clemente	Further review of changes to and draft of confirmation order (.9); analysis of timing issues for Kirschner retention (.5);	2.00

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Date	Name	Narrative	Hours
		assess impact of no transition agreement on plan (.6)	
02/19/21	A Russell	Review, analyze revised confirmation order (.6); correspond with Sidley and Pachulski teams re same (.3).	.90
02/21/21	MA Clemente	Evaluate further revisions to confirmation order	.90
02/22/21	A Russell	Review, analyze comments to confirmation order from objecting parties (.6); correspond with Pachulski team re same (.2); review, analyze entered confirmation order (.1); correspond with Sidley team re same (.1).	1.00
02/22/21	EA Bromagen	Weekly call with FTI and Sidley teams re: various issues (.6); email to Committee re confirmation order (.2)	.80
02/24/21	J Hoffman	Provide analysis for FTI team of plan supplement documents (0.4); review pleadings in connection with same (0.2)	.60
02/24/21	DJ Lutes	Research historical fee issues for plan (.3); emails M. Clemente for same (.1)	.40
Task Subtotal			189.40
21 Tax			
02/08/21	ST Advani	Telephone conference with D. Steinberg regarding Dondero tax claim	.20
02/10/21	ST Advani	Telephone conference with K. Pryor regarding Dondero tax claim (.3); review materials for same (.1)	.40
02/10/21	KR Pryor	Call to S. Advani re: tax claim issue	.30
02/11/21	ST Advani	E-mail to D. Steinberg regarding FOIA request	.30
02/22/21	ST Advani	Telephone conference with D. Steinberg regarding IRS audit (.4); follow-up correspondence with Bankruptcy group regarding same (.2)	.60
02/24/21	ST Advani	E-mail to working group re status of IRS audits	.20
Task Subtotal			2.00
24 Creditor Communications			
02/01/21	MA Clemente	Detailed update to Committee re: various issues (.4); emails with J. Terry re: D&O (.2)	.60
02/02/21	MA Clemente	Call with J. Terry re: various issues (.5); share revised Dondero proposal with the Committee (.1); call with E. Felton re: various issues (.3)	.90
02/03/21	MA Clemente	Call with J. Terry re: various issues (.3); detailed email communications with Committee members re: Dondero plan and analysis (.5); call with LW re: Dondero proposal (.4); email with M. Hankin re: plan (.1)	1.30

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Date	Name	Narrative	Hours
02/05/21	EA Bromagen	Calls with creditors for information (.1); emails with Committee members re same (.1); emails with P. Daugherty re hearing transcripts (.1)	.30
02/06/21	MA Clemente	Call with P. Daugherty re: various issues	.50
02/08/21	MA Clemente	Email with Committee regarding Dondero motion and related updates	.20
02/09/21	MA Clemente	Call with M. Hankin re: various issues	.40
02/10/21	MA Clemente	Call with A. Clubok re: various issues	.30
02/11/21	MA Clemente	Call with A. Clubok re: various issues (.3); call with J. Terry re: various issues (.3); call with M. Hankin re: various issues (.3); emails with committee (.3)	1.20
02/12/21	MA Clemente	Call with J. Terry re: various issues (.4); call with J. Moldovan re: various issues (.3)	.70
02/18/21	MA Clemente	Emails with J. Terry re: deferred comp (.3); address emails from Committee re: deferred comp proposal (.3); review various materials from P. Daugherty (.5)	1.10
02/21/21	MA Clemente	Analysis of various materials from P. Daugherty	1.00
02/23/21	MA Clemente	Call with M. Hankin re: various issues (.3); detailed update email to Committee (.4)	.70
02/24/21	MA Clemente	Call with P. Daugherty re: various issues	.50
Task Subtotal			<u>9.70</u>
Total Hours for all Tasks			701.60

Exhibit D

Expense Detail

Invoice Number: 41001500
Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
12/04/20	11/24/20-Westlaw research service	\$537.26
12/04/20	11/24/20-Westlaw research service	137.20
12/10/20	11/03/20-Lexis research service	57.00
12/10/20	E-Discovery Monthly Service Fee	1,092.00
12/15/20	Professional Services Consulting (Project Mgr)	390.00
12/15/20	Electronic Data Hosting	151.50
12/17/20	12/13/2020 - ON TIME COURIERS INC - 318165 - Dallas weekly courier invoice. See backup for individual CM#'s.	127.60
12/17/20	12/13/2020 - ON TIME COURIERS INC - 318165 - Dallas weekly courier invoice. See backup for individual CM#'s.	51.97
12/17/20	12/02/20-Westlaw research service	69.08
12/17/20	12/02/20-Westlaw research service	182.93
12/17/20	12/02/20-Westlaw research service	110.01
12/17/20	12/02/20-Westlaw research service	2.56
12/17/20	12/03/20-Westlaw research service	91.46
12/17/20	12/03/20-Westlaw research service	27.50
12/17/20	12/03/20-Westlaw research service	1.28
12/17/20	12/04/20-Westlaw research service	45.73
12/17/20	12/07/20-Westlaw research service	39.02
12/17/20	12/08/20-Westlaw research service	320.12
12/17/20	12/10/20-Westlaw research service	182.93
12/17/20	12/11/20-Westlaw research service	320.12
12/17/20	12/12/20-Westlaw research service	45.73
12/17/20	12/14/20-Westlaw research service	45.73
12/17/20	12/12/20-Westlaw research service	91.46
12/17/20	12/14/20-Westlaw research service	137.19
12/17/20	12/15/20-Westlaw research service	117.05
12/17/20	12/15/20-Westlaw research service	182.93
12/18/20	12/17/20-Duplicating Charges (Color) Time: 10:34:00	13.34

Invoice Number: 41001500
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Restructuring

Date	Narrative	Amount
12/18/20	Dec 11, 2020 - Juliana Hoffman - Transcript Fees - Transcript for Motion for Preliminary Injunction	420.50
12/22/20	Professional Services Consulting (Project Mgr)	260.00
12/22/20	Professional Services Consulting (Spec/Tech)	60.00
12/29/20	12/28/20-Duplicating Charges (Color) Time: 14:13:00	1.45
12/29/20	12/28/20-Duplicating Charges (Color) Time: 15:22:00	1.16
12/29/20	12/28/20-Duplicating Charges (Color) Time: 14:28:00	1.16
12/29/20	12/28/20-Duplicating Charges (Color) Time: 14:47:00	15.66
12/29/20	12/28/20-Duplicating Charges (Color) Time: 14:51:00	0.87
12/29/20	12/28/20-Duplicating Charges (Color) Time: 14:11:00	17.98
12/29/20	12/28/20-Duplicating Charges (Color) Time: 15:54:00	3.48
12/29/20	12/28/20-Duplicating Charges (Color) Time: 15:23:00	6.67
12/29/20	12/20/2020 - ON TIME COURIERS INC - 318355 - Dallas weekly courier invoice. See backup for individual CM#'s.	43.73
Total		\$5,403.36

Invoice Number: 41009229
Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
01/04/21	Dec 18, 2020 - Chandler M. Rognes - Transcript Fees - Complaint Transcript	\$350.00
01/06/21	01/01/2021 - TRANSUNION RISK AND ALTERNATIVE DATA SOLUTIONS INC - 24643112020121 - Search Charges	25.00
01/06/21	01/01/2021 - TRANSUNION RISK AND ALTERNATIVE DATA SOLUTIONS INC - 24643112020121 - Search Charges	40.00
01/08/21	E-Discovery Monthly Service Fee	2,284.00
01/11/21	12/31/2020 - SECRETARY OF STATE OF TEXAS - 343001220 - DOCUMENTS	1.00
01/13/21	01/12/21-Duplicating Charges (Color) Time: 15:11:00	2.32
01/13/21	Electronic Search Service 12/17/20 - GENERAL REGISTRY - GEORGETOWN - COMPANY REPORTS	36.59
01/13/21	Electronic Search Service 12/18/20 - TRANSATION FEE - TRANSACTION FEE FOR # 27	0.37
01/13/21	Electronic Search Service 12/17/20 - GENERAL REGISTRY - GEORGETOWN - COMPANY REPORTS	36.59
01/13/21	Electronic Search Service 12/18/20 - TRANSACTION FEE - TRANSACTION FEE FOR # 29	0.37
01/13/21	Professional Services Consulting (Spec/Tech)	120.00
01/13/21	Electronic Data Hosting	246.00
01/14/21	12/22/20-PACER TXNBK	1.60
01/14/21	12/23/20-PACER TXNBK	0.60
01/14/21	12/24/20-PACER TXNBK	0.60
01/14/21	12/25/20-PACER TXNBK	0.60
01/14/21	12/26/20-PACER TXNBK	0.60
01/14/21	12/27/20-PACER TXNBK	0.60
01/14/21	12/28/20-PACER TXNBK	0.60
01/14/21	12/29/20-PACER TXNBK	0.60
01/14/21	12/30/20-PACER TXNBK	0.70
01/14/21	12/31/20-PACER TXNBK	0.70
01/14/21	12/07/20-PACER TXNBK	0.10
01/14/21	12/08/20-PACER TXNBK	5.50

Invoice Number: 41009229
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
01/14/21	12/09/20-PACER TXNBK	0.20
01/14/21	12/10/20-PACER TXNBK	0.20
01/14/21	12/11/20-PACER TXNBK	0.40
01/14/21	12/12/20-PACER TXNBK	0.50
01/14/21	12/13/20-PACER TXNBK	0.50
01/14/21	12/14/20-PACER TXNBK	0.50
01/14/21	12/15/20-PACER TXNBK	0.50
01/14/21	12/16/20-PACER TXNBK	1.50
01/14/21	12/17/20-PACER TXNBK	0.60
01/14/21	12/18/20-PACER TXNBK	0.60
01/14/21	12/19/20-PACER TXNBK	0.60
01/14/21	12/20/20-PACER TXNBK	0.60
01/14/21	12/21/20-PACER TXNBK	0.60
01/14/21	12/22/20-PACER TXNBK	0.60
01/14/21	10/02/20-PACER DEBK	2.30
01/14/21	10/03/20-PACER DEBK	2.30
01/14/21	10/04/20-PACER DEBK	2.30
01/14/21	10/12/20-PACER DEBK	2.30
01/14/21	10/13/20-PACER DEBK	2.30
01/14/21	10/01/20-PACER DEBK	2.30
01/14/21	10/05/20-PACER DEBK	2.30
01/14/21	10/06/20-PACER DEBK	2.30
01/14/21	10/07/20-PACER DEBK	2.30
01/14/21	10/08/20-PACER DEBK	2.30
01/14/21	10/09/20-PACER DEBK	2.30
01/14/21	10/10/20-PACER DEBK	2.30
01/14/21	10/11/20-PACER DEBK	2.30
01/14/21	10/14/20-PACER DEBK	2.30
01/21/21	12/17/20-PACER TXNBK	1.40
01/21/21	12/02/20-PACER TXNBK	2.40
01/21/21	12/10/20-PACER TXNBK	1.30

Invoice Number: 41009229
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
01/21/21	12/11/20-PACER TXNBK	3.40
01/21/21	12/29/20-PACER TXNBK	1.20
01/21/21	12/01/20-PACER TXNBK	4.00
01/21/21	12/02/20-PACER TXNBK	8.90
01/21/21	12/01/20-PACER FLSDC	0.80
01/21/21	12/01/20-PACER TXNBK	4.90
01/21/21	11/20/20-PACER TXNBK	5.50
01/21/21	12/11/20-PACER FLNDC	1.60
01/21/21	12/11/20-PACER TXNBK	0.60
01/21/21	12/11/20-PACER TXNDC	0.90
01/21/21	12/05/20-PACER TXNBK	11.20
01/21/21	12/10/20-PACER TXNBK	1.50
01/21/21	10/02/20-PACER TXNBK	2.40
01/21/21	10/05/20-PACER TXNBK	0.30
01/21/21	10/07/20-PACER TXNBK	0.60
01/21/21	10/08/20-PACER TXNBK	4.20
01/21/21	10/16/20-PACER TXNBK	18.30
01/21/21	10/19/20-PACER TXNBK	2.00
01/21/21	11/02/20-PACER TXNBK	3.20
01/21/21	10/13/20-PACER FLSDC	0.40
01/21/21	11/17/20-PACER TXNBK	0.10
01/21/21	12/22/20-PACER TXNBK	0.10
01/21/21	11/23/20-PACER TXNBK	0.10
01/21/21	01/08/21-Westlaw research service	55.01
01/21/21	01/08/21-Westlaw research service	110.01
01/21/21	01/13/21-Westlaw research service	560.29
01/21/21	01/13/21-Westlaw research service	165.02
01/21/21	01/12/21-Westlaw research service	56.24
01/22/21	01/21/21-Duplicating Charges (Color) Time: 12:05:00	5.22
01/22/21	01/21/21-Duplicating Charges (Color) Time: 12:05:00	6.67

Invoice Number: 41009229
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
01/22/21	01/08/21- Federal Express Corporation- TR #782410161738 D MICHAEL LYNN BONDS ELLIS EPPICH SCHAFER JON 420 THROCKMORTON STREET STE# FORT WORTH, TX 76102	17.72
01/22/21	01/06/21- Federal Express Corporation- TR #782309801882 DENNIS TWOMEY INFORMATION NOT SUPPLIED 607 SUMMERDALE AVE GLEN ELLYN, IL 60137	17.18
01/26/21	01/24/2021 - ON TIME COURIERS INC - 319153 - Dallas weekly courier invoice, see backup for individual CM#'s	94.06
01/26/21	01/24/2021 - ON TIME COURIERS INC - 319153 - Dallas weekly courier invoice, see backup for individual CM#'s	94.06
01/29/21	01/11/21- Federal Express Corporation- TR #782497373235 DEBRA DANDENEAU BAKER & MCKENZIE LLP 452 5TH AVE NEW YORK, NY 10018	13.58
01/29/21	01/11/21- Federal Express Corporation- TR #782497422627 FRANCES SMITH ROSS & SMITH PC 700 N PEARL ST STE 1610 DALLAS, TX 75201	10.69
01/29/21	Jan 28, 2021 - Juliana Hoffman - Transcript Fees - Hearing Transcript for Motion for Entry of Order and Motion for Preliminary Injunction	1,863.25
01/29/21	10/05/20-PACER TXNBK	5.50
01/29/21	10/07/20-PACER TXNBK	5.70
01/29/21	10/08/20-PACER TXNBK	3.70
01/29/21	10/09/20-PACER TXNBK	5.40
01/29/21	10/12/20-PACER TXNBK	10.20
01/29/21	10/13/20-PACER TXNBK	0.30
01/29/21	10/19/20-PACER TXNBK	26.50
01/29/21	10/20/20-PACER TXNBK	5.30
01/29/21	10/21/20-PACER TXNBK	24.80
01/29/21	10/23/20-PACER TXNBK	5.70
01/29/21	10/26/20-PACER TXNBK	25.80
01/29/21	10/27/20-PACER TXNBK	8.60
01/29/21	10/28/20-PACER TXNBK	11.40
01/29/21	10/29/20-PACER TXNBK	4.10
01/29/21	10/30/20-PACER TXNBK	1.10
01/29/21	11/03/20-PACER TXNBK	1.10
01/29/21	11/05/20-PACER TXNBK	1.90

Restructuring

Date	Narrative	Amount
01/29/21	11/08/20-PACER TXNBK	3.00
01/29/21	11/09/20-PACER TXNBK	5.30
01/29/21	11/10/20-PACER TXNBK	3.20
01/29/21	11/13/20-PACER TXNBK	17.60
01/29/21	11/14/20-PACER TXNBK	3.00
01/29/21	11/30/20-PACER TXNBK	28.30
01/29/21	12/01/20-PACER TXNBK	10.10
01/29/21	12/02/20-PACER TXNBK	6.70
01/29/21	12/04/20-PACER TXNBK	9.40
01/29/21	12/07/20-PACER TXNBK	7.60
01/29/21	12/09/20-PACER TXNBK	4.50
01/29/21	12/10/20-PACER TXNBK	4.80
01/29/21	12/11/20-PACER TXNBK	13.10
01/29/21	12/03/20-Telephone Charges Conference Call Customer: HMC1261 MATTHEW A CLEMENTE	2.86
Total		\$6,612.00

Invoice Number: 41013998
Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
02/02/21	02/01/21-Duplicating Charges (Color) Time: 16:01:00	\$7.25
02/02/21	01/31/2021 - ON TIME COURIERS INC - 319355 - Courier service from Dallas office to P.Reid regarding litigation and hearing preparation materials	31.35
02/05/21	01/28/21-Westlaw research service	95.48
02/05/21	01/28/21-Westlaw research service	17.00
02/05/21	01/19/21-Westlaw research service	168.73
02/05/21	01/28/21-Westlaw research service	95.48
02/05/21	01/28/21-Westlaw research service	21.26
02/05/21	01/28/21-Westlaw research service	56.24
02/05/21	01/28/21-Westlaw research service	51.01
02/05/21	01/27/21-Westlaw research service	275.03
02/05/21	01/28/21-Westlaw research service	110.01
02/05/21	01/18/21-Westlaw research service	55.01
02/05/21	01/19/21-Westlaw research service	55.01
02/05/21	01/19/21-Westlaw research service	16.63
02/05/21	01/19/21-Westlaw research service	3.20
02/05/21	01/22/21-Westlaw research service	220.02
02/05/21	01/19/21-Westlaw research service	165.02
02/05/21	01/26/21-Westlaw research service	55.01
02/05/21	01/20/21-Westlaw research service	112.49
02/05/21	01/21/21-Westlaw research service	180.18
02/05/21	01/21/21-Westlaw research service	562.44
02/05/21	01/28/21-Westlaw research service	95.48
02/05/21	01/28/21-Westlaw research service	843.66
02/08/21	Feb 04, 2021 - Juliana Hoffman - Transcript Fees - Hearing transcript - confirmation hearing; agreed motion to assume	354.00
02/09/21	E-Discovery Monthly Service Fee	2,308.00
02/09/21	Electronic Data Hosting	276.00
02/10/21	01/20/21-Lexis research service	135.80

Invoice Number: 41013998
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
02/10/21	01/05/21-Lexis research service	66.50
02/10/21	01/19/21-Lexis research service	886.90
02/10/21	01/20/21-Lexis research service	66.50
02/18/21	02/09/21-Westlaw research service	56.24
02/18/21	02/09/21-Westlaw research service	15.60
02/18/21	02/01/21-Westlaw research service	55.01
02/18/21	02/04/21-Westlaw research service	55.01
02/18/21	02/01/21-Westlaw research service	16.63
02/24/21	02/23/21-Duplicating Charges (Color) Time: 16:45:00	0.29
02/24/21	02/23/21-Duplicating Charges (Color) Time: 16:45:00	0.29
02/24/21	02/23/21-Duplicating Charges (Color) Time: 16:45:00	0.29
02/24/21	01/21/21-Telephone Charges Conference Call Customer: HMC8700 MATTHEW A CLEMENTE	0.21
02/24/21	01/21/21-Telephone Charges Conference Call Customer: HMC9637 MATTHEW A CLEMENTE	5.92
02/25/21	02/24/21-Duplication charges Time: 14:01:00	0.45
02/25/21	02/25/21 - DTI TOPCO INC - 19513690221 - Color Print (8x11 8x14)	519.60
02/25/21	02/25/21 - DTI TOPCO INC - 19513690221 - Color Print (11x17)	7.58
02/25/21	02/25/21 - DTI TOPCO INC - 19513690221 - Color Print (8x11 8x14)	4.06
02/25/21	02/25/21 - DTI TOPCO INC - 19513690221 - B&W Print (8x11 8x14)	15.00
02/25/21	02/25/21 - DTI TOPCO INC - 19513690221 - B&W Print (8x11 8x14)	9.76
02/25/21	01/11/2021 - TSG REPORTING INC - 2037069 - CERTIFIED TRANSCRIPT FOR WITNESS JAMES DONDERO	1,249.30
02/26/21	Feb 25, 2021 - Juliana Hoffman - Transcript Fees - Transcript of hearing on February 23	1,732.75
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:48:00	0.29
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:49:00	0.29
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:45:00	0.29
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:47:00	8.70
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:48:00	0.29
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:44:00	0.29

Invoice Number: 41013998
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
02/27/21	02/26/21-Duplicating Charges (Color) Time: 14:44:00	0.29
	Total	\$11,141.12

Exhibit E

Budget and Staffing Plan for the Interim Fee Period

**Budget by Matter Category for the Period from
December 1, 2020 to and Including February 28, 2021**

Matter Number	Project Category	Hours Budgeted	Total Fees Budgeted¹
005	Committee Meetings	90 - 110	\$90,900 - \$111,100
006	Business Operations	30 - 40	\$29,700 - \$39,600
007	Case Administration	130 - 150	\$137,800 - \$159,000
008	Claims Administration and Objections	25 - 35	\$26,000 - \$36,400
009	Corporate Governance and Board Matters	50 - 55	\$54,500 - \$59,950
010	Employee Benefits and Pensions	0 - 5	\$0.00 - \$5,350
011	Retention	5 - 15	\$4,700 - \$14,100
012	Fee Applications	120 - 140	\$62,400 - \$72,800
014	Litigation	1,100 - 1,250	\$1,056,000 - \$1,200,000
015	Plan and Disclosure Statement	450 - 550	\$486,000 - \$594,000
019	Relief from Stay and Adequate Protection	0 - 5	\$0.00 - \$4,450
021	Tax	0 - 5	\$0.00 - \$7,850
024	Creditor Communications	20 - 30	\$26,400 - \$39,600
	TOTAL	2,000 - 2,400	\$1,960,000 - \$2,352,000
	TOTAL WITH 10% DISCOUNT	2,000 - 2,400	\$1,764,000 - \$1,226,800

¹ Budgeted amounts do not necessarily reflect to a 1:1 ratio because they reflect a blended hourly rate and a variable allocation of timekeepers and hours, depending on the needs for each category.

**Staffing Across All Matter Categories for the Period from
December 1, 2020 to and Including February 28, 2021**

Category of Timekeeper	Number of Timekeepers Expected to Perform Work Across All Matter Categories During the Application Period	Average Hourly Rate²
Partner	5 - 8	\$1,265
Senior Counsel/Counsel	1 – 2	\$1,081
Associate (3+ years since first admission)	3 - 5	\$908
Jr. Associate (1–3 years since first admission)	4 - 6	\$651
Paraprofessionals	2 - 3	\$465
Support Staff	0 – 2	\$243
Total Attorney	13 – 21	\$1,024
Total Non-Attorney	2 – 5	\$459
Total	15 – 26	\$980
Total with 10% Discount	15 – 26	\$882

² The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of chargeable hours worked by, each timekeeper during the Interim Fee Period.

Exhibit F

Customary and Comparable Compensation Disclosure

Customary and Comparable Compensation Disclosure

The blended hourly rate of the Sidley timekeepers (including both professionals and paraprofessionals) who provided services to the Committee during the Interim Fee Period was \$980.37 per hour (the “Committee Blended Rate”).¹ The Committee Blended Rate after applying a 10% Discount was \$882.33 per hour.

The blended hourly standard rate for all of Sidley’s domestic, non-bankruptcy timekeepers during the twelve-month period from March 1, 2020 to and including February 28, 2021 (the “Comparable Period”) was, in the aggregate, approximately \$939.00 (the “Non-Bankruptcy Blended Rate”).²

A detailed comparison of the Committee Blended Rate, Committee Blended Rate with 10% Discount and the Non-Bankruptcy Blended Rate is set forth in the chart below.

Category of Timekeeper	Committee Blended Rate	Committee Blended Rate with 10% Discount	Non-Bankruptcy Blended Rate
Partner	\$1,265	\$1,138.50	\$1,212
Senior Counsel/Counsel	\$1,081	\$972.90	\$1,042
Associate	\$908	\$817.20	\$883
Junior Associate	\$651	\$585.90	\$632
Paraprofessional	\$465	\$418.50	\$344
Aggregate	\$980	\$882.33	\$939

¹ Sidley calculated the Committee Blended Rate by dividing the total fees billed by Sidley timekeepers to the Committee during the Interim Fee Period by the total number of chargeable hours worked by such timekeepers on behalf of the Committee during such period. The Committee Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley, if any, prior to the filing of the Application.

² Sidley calculated the Non-Bankruptcy Blended Rate by dividing the total amount of fees billed to clients by Sidley’s domestic, non-bankruptcy timekeepers during the Comparable Period by the total number of chargeable hours worked on behalf of clients by such timekeepers during the Comparable Period. The Non-Bankruptcy Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley prior to submission of the relevant invoices to Sidley’s clients. For the avoidance of doubt, the Non-Bankruptcy Blended Hourly Rates reflect Firm-wide increases that took effect across all of the Firm’s practice groups on January 1, 2021.